

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

Point Bridge Capital, LLC,

§

Hal Lambert

§

Plaintiffs,

§

v.

§

Charles Johnson,

§

Defendant.

§

Case No. 4:24-cv-00988-P

FIRST AMENDED COMPLAINT¹

Point Bridge Capital, LLC (“Point Bridge”), a Fort Worth, Texas headquartered entity, and Hal Lambert (“Lambert”), a resident of Tarrant County, Texas (together, “Plaintiffs”) bring this lawsuit against Charles Johnson (“Defendant” or “Johnson”).

NEED FOR ACTION

1. Charles Johnson is running a fraud and extortion scheme under which he and his RICO co-conspirator, Gator Greenwill, falsely present themselves as intelligence agents or assets of U.S. government agencies. Johnson and Greenwill seek investments in upstart technology companies operating in the defense and intelligence sectors, which heavily rely on government contracts. If a company or investor doesn’t give in to their demands for equity or favorable investment terms, Johnson and Greenwill threaten to sabotage the companies’ contracts or funding under the guise of their false claims to be government agents. Johnson has wrongfully succeeded in profiting from and gaining interests in these cutting-edge technology companies using this shakedown scheme.

¹ This First Amended Complaint is being submitted as a “matter of course” because it is filed within 21 days of service of the original filing in this case. See FED. R. CIV. P. 15(a)(1).

2. Johnson began his fraudulent and extortive criminal enterprise after his once-promising career in mainstream conservative journalism fell through due to publishing several unsubstantiated pieces. Embracing his “reputation as a peddler of disinformation”² and proud of his “patented trolling techniques,”³ Johnson ended up posting almost exclusively on his own sites and forums such as Substack, Reddit, and X, where he denied the Holocaust and accused hundreds of prominent politicians, businessmen, and activists of being spies or assets of foreign governments.

3. At some point, Johnson’s conduct attracted the attention of the Federal Bureau of Investigation. Johnson then began providing information to the FBI as a confidential informant.

4. Johnson touted his FBI contacts to inflate his purported status as an intelligence “asset” to insinuate (and later, fabricate) relationships with senior U.S. security and law enforcement officials and agencies.

5. Despite no longer serving as an FBI informant, Johnson continues to deceptively describe himself as a “federal operative.” He often implies or explicitly states that he speaks on behalf of law enforcement and intelligence agencies when making his false claims. Johnson then joined forces with his co-conspirator Greenwill, who similarly deceptively describes himself as being affiliated with the CIA.

6. Together with Greenwill, Johnson has threatened to use his claimed ties with federal law enforcement to induce baseless investigations, lawsuits and regulatory actions, and to

² Kashmir Hill, *Your Face is Not Your Own*, N.Y. Times Magazine (Mar. 18, 2021), <https://www.nytimes.com/interactive/2021/03/18/magazine/facial-recognition-clearview-ai.html>.

³ Madeleine Aggeler, *Here’s How an Alt-Right Troll Auditions for Survivor*, The Cut (Feb. 27, 2018), <https://www.thecut.com/2018/02/chuck-johnson-alt-right-troll-auditions-for-survivor.html>.

spread false and damaging allegations about individuals’ supposed ties to foreign governments, in order to extort money from them.

7. Johnson and Greenwill falsely claim affiliation with and support from the U.S. law enforcement and intelligence communities to attempt to induce businessmen to invest with them either by promising government contracts or threatening Internal Revenue Service (“IRS”) audits, Securities and Exchange Commission (“SEC”) investigations, or other sanctions, which neither law enforcement nor intelligence services are lawfully permitted to threaten or promise.

8. Johnson and Greenwill repeatedly schemed to induce counterparties into sham or shoddy investments—or to extract unduly favorable returns from existing ventures—by using Johnson’s supposed status as a “federal operative” to fraudulently promise government contracts or fraudulently threatening government reprisal.

9. Plaintiffs are among the victims of this criminal enterprise, which continues to this day and has spanned multiple years.

10. Lambert, Point Bridge’s founder and principal, first met Johnson in 2016, when Johnson contacted him with an unsolicited offer to help raise money for a political candidate.

11. In November 2020, Point Bridge accepted a cash investment from Johnson and accorded him a minority stake in a special-purpose investment vehicle (“SPV”) for Umbra Space—a satellite imaging company with significant government contracts.

12. Soon thereafter, Johnson and Greenwill began pressuring Plaintiffs to violate their fiduciary duties, and take Johnson’s side, in a dispute between Johnson and Clearview AI, Inc., on whose board Lambert served and in which Point Bridge invests.

13. After Lambert, Point Bridge and its portfolios refused to do Johnson and Greenwill’s bidding, Johnson, claiming to be working on behalf of the U.S. government, tried to

intimidate and deceive Lambert's colleagues, Point Bridge's investors, and the public to extort Plaintiffs, and even going so far as to file frivolous litigation in federal court. In these actions, Johnson falsely claimed that the U.S. government was supporting and even instigating his tortious and illegal actions.

14. After one of his frivolous lawsuits against Plaintiffs was dismissed by a Virginia federal court, Johnson repeatedly defamed Lambert with knowingly false claims that Lambert engaged in sexual harassment, engaged in fraud, and was a "front" for hostile foreign governments and criminal enterprises.

15. Johnson's escalating misconduct against former business counterparties, including Plaintiffs, requires federal court intervention.

16. Plaintiffs seek appropriate relief under 18 U.S.C. § 1962(c), including an injunction against Johnson's involvement in the criminal enterprises and restrictions against his predatory business activities and criminal schemes, treble damages, and attorney's fees and costs.

17. Point Bridge also seek damages for Johnson's breach of contract, and Lambert individually seeks damages and other relief against Johnson for defaming him.

JURISDICTION AND VENUE

18. This Court has subject matter jurisdiction over this action because complete diversity of citizenship exists between the parties, and the amount in controversy exceeds \$75,000, exclusive of costs and interest. 28 U.S.C. § 1332(a). Plaintiffs are citizens of Texas for jurisdictional purposes. Johnson is a citizen of Virginia for jurisdictional purposes.

19. Subject-matter jurisdiction also arises under 28 U.S.C. § 1331 based upon the federal Racketeering and Corrupt Organizations Act ("RICO") claims asserted under 18 U.S.C. § 1961 *et seq.* and principles of supplemental jurisdiction under 28 U.S.C. § 1337(a).

20. This Court properly has personal jurisdiction over Johnson that comports with Texas' long-arm statute, Title 2, Chapter 17 of the Texas Civil Practice and Remedies Code, and the United States Constitution. Texas' exercise of jurisdiction over Johnson is reasonable because he has engaged in a RICO conspiracy and committed underlying predicated acts targeted against Point Bridge, an entity headquartered in and operated out of Texas, and Lambert, a Texas resident, and Texas has a special interest in exercising jurisdiction over those who have intentionally targeted people and entities within its borders.

21. In addition, Texas' exercise of jurisdiction over Johnson is reasonable because he has committed intentional torts against Lambert, a citizen and resident of Texas, and Texas has a special interest in exercising jurisdiction over those who have committed intentional torts within and targeting the stated. For example, Johnson stated that Lambert was a "front" for Russian money in the state: "[I]n the case of Hal, you know, Hal is very much, you know, tied in with the, with the Russian world, particularly in the Russian and the covid world, particularly operating in *Texas*." Johnson also accused Lambert of having "sexually [] assaulted some women at parties in Austin." Thus, Johnson's defamatory statements specifically referenced Lambert's purported activities in Texas—where he knew Lambert resides and where Lambert is likely to suffer harm.

22. Venue is proper in the Northern District of Texas under 28 U.S.C. § 1391(b)(2) because a substantial part of the events described herein occurred within the district. Among other things, this district is where Johnson's liability arises and where he intended for the harm to be felt. Venue is further proper in this district pursuant to 18 U.S.C. § 1965 and 28 U.S.C. § 1391 because Johnson is subject to personal jurisdiction in this district.

PARTIES

23. Point Bridge is a Delaware LLC with its principal place of business in Fort Worth, Texas. Point Bridge provides high-net-worth individuals customized investment management advice across all asset classes. Point Bridge does not have any member that is not a citizen of Texas.

24. Lambert is a resident of Tarrant County, Texas. He is an investor and respected member of the community. He runs several businesses and is involved in non-profit organizations. He is the founder of one of Texas' premier venture capital firms responsible for many successful high-profile investments. He is also an active philanthropist supporting educational, environmental, public safety, and law enforcement causes, among others.⁴

25. Lambert has been married to his wife for 29 years. They share two daughters.

26. For decades, Lambert has held high-level roles at some of the most respected investment firms in the world. Lambert spent around 15 years managing portfolios at Credit Suisse and J.P. Morgan. He was a director at Credit Suisse, where he advised and managed client assets exceeding \$1 billion. For J.P. Morgan, Lambert headed discretionary portfolio management for the Southwest and Western regions of the United States. Lambert was also a credit analyst for the Texas-based Bass Family, where he focused on convertible bond arbitrage.

27. Lambert is active in conservative politics. He served on the Inaugural Committee for President Donald Trump and worked as a National Finance Chair for Ted Cruz's 2016

⁴ To be clear, none of the allegations in this Complaint should be read as a statement or admission, whether express or implied, that Lambert is anything other than a private person for purposes of the law, or that he is a public figure or a limited-purpose public figure.

presidential campaign. He was the Finance Chair for the Texas GOP and has raised funds for several candidates in federal and state campaigns in Texas.

28. In 2013, Lambert founded Point Bridge, which provides high-net-worth individuals customized investment management advice across all asset classes. In conjunction with his work at Point Bridge Capital, Lambert created the “MAGA ETF,” a publicly traded exchange fund, and the Politically Responsible Investing Strategy, a trademarked approach to investing in companies that share a Republican political ideology.

29. Johnson lives in Reston, Virginia. He has nearly 19,000 followers on the social media platform “X” from all across the United States, where he both makes short posts and hosts lengthy audio “Spaces” where he will typically have multi-hour “discussions” with his followers.⁵ He also maintains an active blog on Substack, where he presents himself as “a successful entrepreneur, investor, and writer” and CEO of a genomics company with close ties to federal intelligence agencies.⁶ He claims to possess billions in assets and “portfolio companies” in the areas of “genetics, facial recognition, defense technology, financial tracking software, solar powered cars, submarines, and Turkish restaurant technology.”⁷

STATEMENT OF FACTS

A. **Johnson initially presents himself as an online troll combatting the “Deep State.”**

30. Johnson once had a promising career in conservative journalism, writing for online publications including *Breitbart* and the *Daily Caller*.

⁵Charles Johnson’s Thoughts & Adventures (@JohnsonThought) <https://x.com/JohnsonThought1>.

⁶ See Charles Johnson, *Why Subscribe?*, Substack, <https://charlesjohnson.substack.com/about>.

⁷ *Id.*

31. In 2013, after he lied to his editors and published unsubstantiated stories, his freelancing arrangement with the *Daily Caller* was terminated. Johnson started his own publication, GotNews, in 2014.

32. Johnson became a pariah within conservative journalism. By the time Johnson's journalism career failed in the mid-2010s, he had built a reputation as "the most hated man on the internet."⁸ A 2014 *Washington Examiner* article noted that Johnson "is described as a joke, toxic and derailed. Not by liberals but by others in Right-leaning media and the blogosphere."⁹ The article shared quotes from fellow-conservative journalists, including former colleagues, sharing their unfavorable opinions of him:

- He is an "activist, not a journalist ... [a]nd a very sloppy activist considering all the facts he gets wrong";
- "If the liberals at Salon or MSNBC were to create a caricature of a conservative reporter, it would be Charles Johnson"; and
- "[I]t wasn't long before I realized that he's completely [nuts]."¹⁰

33. On August 12, 2017, GotNews falsely accused a Michigan man of being responsible for the vehicular murder at the alt-right "Unite the Right" rally in Charlottesville, Virginia, describing the man, who was not even in the state of Virginia at the time of the murder, as a "Terrorist" and an "Anti-Trump, Open Borders Druggie." This person sued GotNews and

⁸ 'Most Hated Man on the Internet' Found in Fresno, ABC30 Action News (Jan. 2, 2015), <https://abc30.com/charles-c-johnson-most-hated-man-on-the-internet-ferguson-darren-wilson/459968/>.

⁹ Eddie Scarry, *Media Conservatives Won't Claim Derisive Blogger Charles Johnson*, Washington Examiner (Dec. 10, 2014, 9:10 p.m.), <https://www.washingtonexaminer.com/politics/607827/media-conservatives-wont-claim-derisive-blogger-charles-johnson/>.

¹⁰ *Id.*

Johnson in his personal capacity for defamation. The complaint survived a motion to dismiss.¹¹

GotNews declared bankruptcy in 2018 and the case was settled.

34. Based on this type of defamatory reporting, Johnson is called a “peddler of disinformation” and an “alt-right uber-troll.”¹²

35. Despite his failing career, Johnson leveraged the connections he had developed as journalist to meet prominent politicians and businessmen.

36. Johnson’s poor reputation was not known far beyond narrow professional circles in political journalism. Prior to 2017, Johnson primarily used the nickname “Chuck” in his controversial reporting and on his social media. Then, after Donald Trump became president, he began exclusively using “Charles.” There are well over 50 Charles Johnsons on Wikipedia including prominent Republican donors and political bloggers, which made his unsavory writings and associations difficult to learn about based on cursory Google searches.¹³

37. Johnson aggressively asked acquaintances to introduce him to others in business and politics. Many people who have met Johnson, including Lambert, would frequently receive unsolicited text introductions from Johnson to other people of note. Out of a desire to be polite and avoid conflict, few contradicted Johnson’s claims on these text threads.

¹¹ *Vangheluwe v. GotNews, LLC*, 365 F. Supp. 836, 839 (E.D. Mich. 2019).

¹² Ben Shapiro, *Conservatives Oust Bigotry, and the Left Only Slams Them for It*, National Review (Aug. 28, 2018, 6:30 a.m.), <https://www.nationalreview.com/2018/08/conservatives-oust-bigotry-left-only-criticizes-them-for-it/>.

¹³ Wikipedia, Charles Johnson, https://en.wikipedia.org/wiki/Charles_Johnson (as of Oct. 11, 1:01 p.m. CT).

38. During this time, Johnson collaborated with neo-Nazi hacker Andrew “Weev” Auernheimer,¹⁴ who was convicted of violating the Computer Fraud and Abuse Act, 18 U.S.C. § 1030.¹⁵

39. In 2017, Johnson and then-Congressman Dana Rohrbacher (CA-48) met with WikiLeaks editor Julian Assange in the Ecuadorian Embassy in London. Assange was then under investigation for allegedly facilitating Russian interference in the 2016 U.S. presidential election. Johnson then refused to cooperate with the Senate Intelligence Committee, which was investigating allegations of Russian collusion in the same election, when it requested “documents and emails . . . about any contacts he has had with Russian agents.”¹⁶

40. In addition to Assange and Auernheimer, Johnson championed other criminal defendants championed by opponents of U.S. intelligence agencies, such as Silk Road founder Ross Ulbricht.¹⁷

41. Johnson’s early business ventures included Freestartr, which was designed to circumvent financial deplatforming, and Bitcoin mining company Castar Capital.

¹⁴ Michael Miller, *Controversial Blogger, Infamous Hacker Team Up to Release Remaining Planned Parenthood Videos*, The Washington Post (Oct. 23, 2015, 5:18 a.m.), <https://www.washingtonpost.com/news/morning-mix/wp/2015/10/23/controversial-blogger-infamous-hacker-team-up-to-release-remaining-planned-parenthood-videos/>.

¹⁵ Auernheimer’s conviction was overturned on appeal for improper venue. See *United States v. Auernheimer*, 748 F. 3d 525 (3d Cir. 2014).

¹⁶ See Michael Isikoff, ‘Alt-Right’ Figure Who Set Up Assange Meeting Refuses to Cooperate with Senate Intel Probe, Yahoo! News (August 28, 2017), <https://www.yahoo.com/news/alt-right-figure-set-assange-meeting-refuses-cooperate-senate-intel-probe-172020121.html>.

¹⁷ See Charles Johnson, *A Twitter Road to Redemption? My Open Letter to @Jack and @JoeRogan*, VDare.com (March 13, 2019), <https://www.vdare-archive.com/articles/charles-johnson-a-twitter-road-to-redemption-my-open-letter-to-jack-and-joerogan.html>.

42. When Johnson was involved with the facial-recognition app SmartChekr in 2017, it was designed to serve as an “opposition research” tool. In 2021, the *New York Times* reported that “Johnson believes that giving this superpower only to the police is frightening.”¹⁸

43. Johnson’s writings, political activism, and associations during this period are inconsistent with that of a “federal operative” working on behalf of federal law enforcement and intelligence agencies, which he now claims to have been doing throughout this entire period.

44. At times Johnson has tried to claim that his “activism” was actually conducted on behalf of intelligence services.

45. On October 2, 2024, he posted on X, “The Russian Jew criminals who ran the Mueller inquiry mistook my kindness for Assange as evidence of me joining Putin. Naughty Jews with their MSNBC contracts, naughty naughty. I’m so speCIA1 [he capitalized the letters ‘CIA’ in ‘special’] visiting all the people for Uncle Sam.” [emphasis added].¹⁹

46. On October 4, 2024, Johnson claimed his past Holocaust denial was actually part of an elaborate sting operation: “One might even wonder if the operation was to deny the Holocaust so as to identify the Nazi network in the United States and if my Nazi compromised family members might have provided such a way in.”²⁰

¹⁸ See Hill, *Your Face is Not Your Own*, New York Times Magazine.

¹⁹ @JohnsonThought1, X, (Oct. 2, 2024, 10:17 PM), <https://x.com/JohnsonThought1/status/1841663904428032280>.

²⁰ @JohnsonThought1, X, (Oct. 4, 2024, 4:19 PM), <https://x.com/JohnsonThought1/status/1842298801572487382>.

47. Johnson's admission that he engaged in Holocaust denial contradicts his claim in past litigation that the Huffington Post libeled him when it called him a Holocaust denier.²¹

B. Johnson flip-flops and begins falsely claiming he's a government agent.

48. In 2017, Johnson shared that he was helping marijuana growers facing banking problems use cryptocurrency, claiming to have amassed tens of millions of dollars in Bitcoin. In late 2017, he told acquaintances he had run into legal problems because of that.

49. Beginning in late 2019, Johnson has repeatedly claimed to be affiliated with or an agent or operative of a variety of U.S. law enforcement and intelligence agencies, sometimes identifying specific agencies, other times referring generically to the "government," "Uncle Sam," or the "Deep State."²²

50. In October 31, 2023 and June 28, 2024 lawsuits he filed *pro se* against Point Bridge and Lambert in the U.S. District Court for the Eastern District of Virginia, Johnson described himself as a "federal operative."²³

51. In 2020, when the Huffington Post reported on Johnson's involvement with Clearview, Johnson "pretended to be an undercover U.S. intelligence operative who'd been

²¹ See *Johnson v. TheHuffingtonPost.com, Inc.*, 21 F.4th 314, 316 (5th Cir. 2021) (noting "Charles Johnson says the Huffington Post libeled him by calling him a white nationalist and a Holocaust denier" and upholding dismissal of Johnson's libel action for lack of personal jurisdiction.).

²² The term "Deep State" is typically used pejoratively to describe civil service employees of the intelligence agencies acting independently of elected officials. See Amanda Taub & Max Fisher, *As Leaks Multiply, Fears of a 'Deep State' in America*, N.Y. Times (Feb. 16, 2017), <https://www.nytimes.com/2017/02/16/world/americas/deep-state-leaks-trump.html>. Johnson now embraces this term and uses it to describe himself and the government agencies he claims to work with.

²³ Compl. ¶ 8, ECF No. 1, *Johnson v. Lambert*, Nos. 1:23-cv-1485 (*Johnson II*) (E.D. Va. Oct. 31, 2023), 1:24-cv-1124 (*Johnson III*) (E.D. Va. Jun. 28, 2024).

recruited out of high school. ‘Would prefer being kept out of whatever you are doing ... Nearly got me killed by a foreign government last time.’”²⁴

52. In a July 19, 2021 Substack post, Johnson wrote: “The Israelis have targeted me for serving my country and its government.”²⁵

53. In an August 9, 2023 Substack post, Johnson claimed, “[M]y character [was] assassinated by the foreign-funded press when I was serving my country in an undercover capacity—yes, really . . .”²⁶

54. In an August 1, 2024 Substack post, Johnson asserted, “I have known the NSA [National Security Agency] types a lot earlier than I have publicly discussed, especially when they spotted me when I participated in various nerd pursuits in the greater Boston and L.A. areas.”²⁷

55. In an August 15, 2024 X Space, Johnson said, “I have had a relationship with the [FBI] and the NSA since I was 17 years old. I’m now 35 years old. Couldn’t vote, right? Couldn’t join the military without permission. But, you know, I ended up having a relationship with both of these three letter agencies and through blood.”²⁸

²⁴ Luke O’Brien, *The Far-Right Helped Create the World’s Most Powerful Facial Recognition Technology*, *The Huffington Post* (Apr. 9, 2020), https://www.huffpost.com/entry/clearview-ai-facial-recognition-alt-right_n_5e7d028bc5b6cb08a92a5c48.

²⁵ Charles Johnson, *A Jeffrey Epstein in Every Pocket*, Substack (July 19, 2021), <https://charlesjohnson.substack.com/p/a-jeffrey-epstein-in-every-pocket>.

²⁶ Charles Johnson, *About Richard Hanania, Please Don’t Shoot the Help! Letter to Young Radicals, Middle Aged Influencers, and Aging Tech Oligarchs*, Substack (Aug. 9, 2023), <https://charlesjohnson.substack.com/p/about-richard-hanania-please-dont>.

²⁷ Charles Johnson, “*The Quiet Conflict*”: *The FBI vs. the CIA/NSA on the Steele Dossier*, Substack (Aug. 1, 2024), <https://charlesjohnson.substack.com/p/the-quiet-conflict-the-fbi-vs-the>.

²⁸@JohnsonThought1, “Why they attack Fuentes what he gets right and what he gets wrong”, X Space, (Aug. 15, 2024), <https://charlesjohnson.substack.com/p/the-quiet-conflict-the-fbi-vs-the>. (See Exhibit 1 at I-E.

56. On October 16, 2024, Johnson posted on X that “I got recruited while in high school and later college. I have had many handlers, including Jeffrey Epstein and Johnathan Buma” and that “[m]y core reason for not talking about this stuff is that I was running active counterintelligence operations.”²⁹

57. It is a federal felony to falsely claim to be a government agent or to impersonate a federal officer.³⁰ The law does not require one to specify his exact position or agency, as “[i]t is the false pretense of Federal authority that is the mischief to be cured.”³¹

58. Texas Penal Code § 37.11 prohibits “impersonat[ing] a public servant with intent to induce another to submit to the person’s pretended official authority or to rely on the person’s pretended official acts.”

59. On October 19, 2023, *Business Insider* reported that Johnson was a confidential human source (“CHS”) for FBI Special Agent Jonathan Buma.³²

60. The U.S. Attorney General’s Guidelines Regarding the Use of FBI Confidential Human Sources define a CHS as “[a]ny individual who is believed to be providing useful and credible information to the FBI for any authorized information collection activity, and from whom the FBI expects or intends to obtain additional useful and credible information in the future, and whose identity, information, or relationship with the FBI warrants confidential handling.”³³

²⁹ @JohnsonThought1, X (Sept. 16, 2024, 10:21 p.m.), <https://x.com/JohnsonThought1/status/1835866690770366946>.

³⁰ See 18 U.S.C. § 912.

³¹ *United States v. Barnow*, 239 U.S. 74, 78 (1915).

³² Mattathias Schwartz, *Exclusive: Tech Billionaire Peter Thiel Was an FBI Informant*, *Business Insider* (Oct. 19, 2023), <https://archive.is/7bIlN>.

³³ Office of the Attorney Gen., U.S. Dep’t of Justice, *The Attorney General’s Guidelines Regarding the Use of FBI Confidential Human Sources* § I.B.7. (2020), available at

61. FBI guidelines require a CHS's handler to admonish the source that he or she "is not an employee of [the U.S. government] and may not represent himself or herself as such, except under circumstances where the CHS has previously been, and continues to be, otherwise employed by the [government]." The FBI handler then "must document in the CHS's . . . file (via the CHS admonishment form) that the additional admonishments have been provided and that the CHS acknowledged receipt and understanding of the admonishments."³⁴

62. Another former informant was convicted of false impersonation of an FBI agent under 18 U.S.C. § 912. The former informant told police officers conducting a traffic stop that "he was a federal agent who investigated corrupt police officers," and that "he was going to take down their information and request an investigation." The officers contacted an FBI agent to confirm the former informant's account; the agent told them that the former informant "had worked previously as an FBI source and provided information to the agency." At trial, the agent testified "that FBI sources are not FBI employees or agents, and are made aware of this fact before they start."³⁵

63. In affirming the conviction, the First Circuit agreed with the district court's observation that "[a]nyone can call the FBI at any time. . . . That does not make those folks informants, much less, paid sources, and even more so, special agents."³⁶

64. Johnson described his work as an informant as if he were the heroic protagonist in a spy novel. In an October 19, 2023 Substack post, he wrote:

[https://www.justice.gov/oip/foia-library/foia-processed/general_topics/ag_guidelines_FBI_human_confidential_sources_2/dl?inline.](https://www.justice.gov/oip/foia-library/foia-processed/general_topics/ag_guidelines_FBI_human_confidential_sources_2/dl?inline)

³⁴ Directorate of Intelligence, Fed. Bureau of Investigation, *Confidential Human Source Policy Guide* at 43 (May 21, 2019), available at <https://vault.fbi.gov/confidential-human-source-policy-guide-1018pg/confidential-human-source-policy-guide-1018pg-part-01-of-01/view>.

³⁵ *United States v. Vázquez-Rosario*, 45 F.4th 565, 568 (1st Cir. 2022).

³⁶ *Id.* at 573.

I did this work at great expense, both financial and stress, and I enjoyed every bit of it. Family members of mine had served in the intelligence community and as undercovers and I suppose you could say I wanted to prove my mettle. To be honest I like the danger of it. I want to change the world for the better even if it means that doing so might mean I am no longer in it. I live for this work.³⁷

65. On September 21, 2024, Johnson posted on X, “I have done some extremely interesting and altogether dangerous things on behalf of this country. And I intend to keep doing them until the very end.”³⁸

66. The FBI terminated Johnson’s CHS status sometime in 2021. According to one of Johnson’s close associates, Jordan Arthur Bloom, this occurred in November 2021.³⁹

67. In a sworn statement to the Senate Judiciary Committee, Buma claimed that the FBI told him to “to discontinue reporting from this source”—that is, Johnson—because his superiors were concerned about Johnson’s “inappropriate comments on social media.”⁴⁰

68. By Buma’s own account, his association with Johnson troubled the FBI and led in part to his superiors sidelining him from counterintelligence operations.⁴¹

³⁷ Charles Johnson, *On My Extracurricular Activities, the Business Insider Thiel Story, and Founders Fund*, Substack (Oct. 19, 2023), <https://charlesjohnson.substack.com/p/on-my-extracurricular-activities>.

³⁸ @JohnsonThought1, X (Sept. 21, 2024, 11:35 p.m.), <https://twitter.com/JohnsonThought1/status/1837697234428625346>.

³⁹ J. Arthur Bloom, The Targeting of Special Agent Johnathan Buma, Substack (Oct. 9, 2024), <https://arthuriana.substack.com/p/the-targeting-of-special-agent-johnathan>.

⁴⁰ S. Comm. On the Judiciary at 16 (July 15, 2023) (statement of Jonathan C. Buma, FBI Senior Special Agent), <https://www.documentcloud.org/documents/23909892-kirkpatrick-buma-2023-08-14>.

⁴¹ *Id.* at 13–14.

69. On November 13, 2023, the FBI executed a search warrant on Buma's residence. According to Buma's lawyer, he was under suspicion for unauthorized removal of classified documents and national-defense documents.⁴²

70. On September 24, 2024, Bloom posted a September 19, 2024 letter from the U.S. Department of Justice Office of Professional Responsibility to Buma's attorney dismissing Buma's employment claims against the agency. According to the letter, "in November 2023, the FBI searched [Buma's] residence, suspended his security clearance, and placed him on indefinite suspension from duty."⁴³

71. On October 7, 2024, Bloom confirmed that he was in touch with Buma, posting on X: "Special Agent Buma has given me permission to share some of the zersetzung-style [psychological warfare] targeting and retaliation he has experienced since deciding to become a whistleblower, piece later this week."⁴⁴

72. On September 23, 2024, Johnson hosted an X Space titled "The collapse of the FBI, sensors, Nick Fuentes and power," where he acknowledged that FBI leadership did not accept the information he gave to Buma. Rather than admitting that he had in fact provided false information to the FBI, Johnson concocted an elaborate conspiracy of "dirty FBI agents" who supposedly undermined him:

I think the other big issue too is that the confidential informant system is deeply corrupt and deeply fucked up . . . because I've had things entered

⁴² Dan Friedman, *FBI Raids Home of Prominent Bureau Whistleblower*, Mother Jones (Nov. 14, 2023), <https://www.motherjones.com/politics/2023/11/fbi-raids-buma-whistleblower-giuliani/>.

⁴³ J. Arthur Bloom, *Special Agent Johnathan Buma's Whistleblower Retaliation Complaint Was Shot Down Last Week*, Substack (Sept. 24, 2024), <https://arthuriana.substack.com/p/special-agent-johnathan-bumas-whistleblower>. The letter itself is available at <https://arthuriana.substack.com/api/v1/file/adf03ed0-94c7-4467-b5ef-0906349c1486.pdf>.

⁴⁴ @j_arthur_bloom, http, X (Oct. 7, 2024) 2:58 PM, https://x.com/j_arthur_bloom/status/1843365248692302207.

into the files that I sent that were the opposite of what I put in the fucking system, which makes me very upset, because it makes me look incompetent, and I hate looking incompetent, and so I ended up getting in all this trouble for, you know, basically putting things into the system that were wrong. And what ended up happening is I started writing the reports for Jonathan Buma and for others. And you know what I'm hopeful now is that a lot of the dirty FBI agents can be helpful, can really, like, clean themselves up, but really, at this stage ... a lot of us who are, like, mistreated by the FBI or by the Department of Homeland Security or whatever, we should be recompensed in a serious way.⁴⁵

73. At times, Johnson is more candid about his limited role as a former informant. On an August 15, 2024 X Space, he said, “I was the federal informant for a long time, although occasionally I’ll talk to the Feds now, but I was officially closed out as a federal informant, whatever.”⁴⁶

74. Despite these occasional moments of candor, Johnson continued to claim to speak on behalf of the FBI well past 2021.

75. On September 11, 2024, Johnson found himself in a contentious online exchange with conservative commentator and former Donald Trump speechwriter Darren Beattie. After Beattie mocked Johnson’s false claims of CIA involvement, Johnson suggested that the agency would shut down his publication: “You’ll see Darren routinely do the work of the Russian Jewish Mafia until his publication is turned off. Won’t be long now.”⁴⁷ Beattie sarcastically responded, “[a]re your imaginary friends in the CIA coming after me[?] . . . This is terrible! Save me. If I

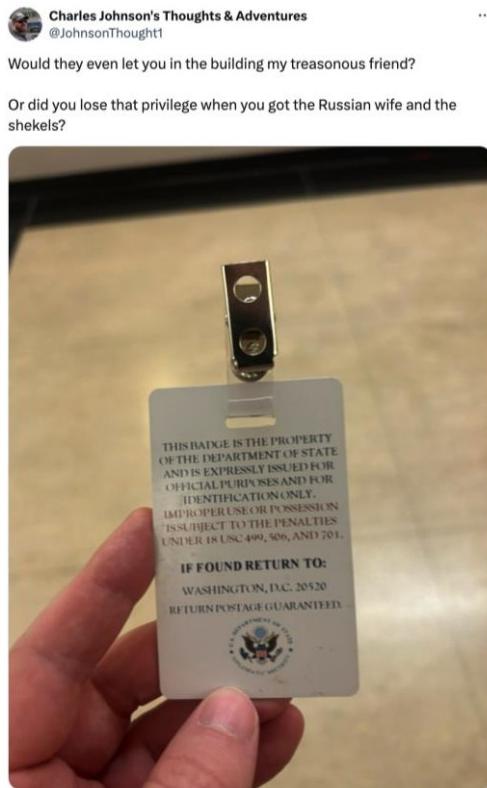
⁴⁵ Exhibit 1 at I-G, The Space was originally hosted at <https://x.com/JohnsonThought1/status/1838080187046482109>, but Johnson later acknowledged deleting it. See @JohnsonThought1, X (Sept. 24, 2024, 11:38 a.m.), <https://x.com/JohnsonThought1/status/1838603979518869927>.

⁴⁶ *Id.*

⁴⁷ @JohnsonThought1, X (Sept. 11, 2024, 8:35 a.m.), <https://x.com/JohnsonThought1/status/1833846754141200696>.

invest in one of your dogshit companies will you tell your imaginary girlfriends in the CIA to leave me alone?”⁴⁸

76. Johnson responded by posting a visitor’s pass to the U.S. State Department (on September 9, Johnson posted on X that he was meeting with “state officials”) and asked, “Would they even let you in the building my treasonous friend? Or did you lose that privilege when you got the Russian wife and the shekels?”⁴⁹



77. Of course, neither a State Department visitor’s pass nor “occasionally” talking “to the feds” make someone a “federal operative” or agent.

⁴⁸ @DarrenJBeattie, X (Sept. 11, 2024, 8:42 a.m.), <https://x.com/DarrenJBeattie/status/1833848669826588866>.

⁴⁹@JohnsonThought1, X (Sept. 11, 2024, 8:49 a.m.), <https://x.com/JohnsonThought1/status/1838603979518869927>.

78. On October 8, 2024, Johnson once again claimed to be “working closely” with another government intelligence agency, the National Geospatial Intelligence Agency.⁵⁰ When Beattie replied, “lol no you’re not,” Johnson replied: “But I am Darren.”⁵¹ Johnson again stated that he “worked closely with those trying to clean up the NGA” in an October 19, 2024 X post.⁵²

79. On October 9, 2024, Johnson further taunted Beattie claiming “Off to my 9 o’clock with the State Department.”⁵³

80. On October 10, 2024, when another “X” user asked Johnson, “do you really work at the state department?,” Johnson replied, “I work with a number of government agencies.”⁵⁴

C. Johnson weaponizes false claims about his government ties to defraud and extort.

81. Johnson’s false claims of government authority are not limited to mere self-aggrandizing. He freely volunteers that he makes these claims to pressure and threaten others into investing in his pet projects and contributing to his own business interests.

82. Johnson favorably compares himself to the late businessman and sex offender Jeffrey Epstein. Epstein purportedly made business investments on behalf of the CIA by extorting “compromised billionaires.”

⁵⁰ @JohnsonThought1, X (October 8, 2024, 6:27 p.m.), <https://x.com/JohnsonThought1/status/1843780168042852627>.

⁵¹ @JohnsonThought1, X (October 9, 2024, 8:13 p.m.), <https://x.com/JohnsonThought1/status/1844169427455180943>.

⁵² @JohnsonThought1, X (October 19, 2024, 7:27 p.m.), <https://x.com/JohnsonThought1/status/1847781660819075233>.

⁵³ @JohnsonThought1, X (Oct. 9, 2024, 8:13 p.m.), <https://x.com/JohnsonThought1/status/1844169427455180943>.

⁵⁴ @JohnsonThought1, X (Oct, 10, 2024, 1:38 a.m.), <https://x.com/JohnsonThought1/status/1844251220460044636>.

83. On an August 18, 2024 X Space, Johnson said, “I know this is gonna sound very fucked up and kind of weird, but I think I’m supposed to be, you know, the new Epstein” in that both he and Epstein were “kind of private sector, kind of public sector, that are very good at, like, investing in new technologies as they were coming out.”⁵⁵

84. On August 20, 2024, Johnson wrote, “I suspect my methods are not unlike those of Jeffrey Epstein” because “Epstein offered compromised billionaires . . . an off-ramp” from legal troubles by investing in U.S. government-favored companies.⁵⁶

85. In that same Substack post, Johnson described himself as the “good cop” who gives wealthy individuals an opportunity to do what he says or face more serious consequences from the government: “If you get a message from me and you’re a wealthy person, you should probably pay attention. I’m the good cop. What comes after me is not so nice.”⁵⁷ He continued:

To borrow a phrase from *The Departed*’s Staff Sergeant Sean Dignam in one of his best moments: ‘Hey a—hole, he can’t help you! I know what you are, okay? I know what you are and I know what you are not. I’m the best friend you have on the face of this earth, and I’m gonna help you understand something, you punk.’ Dignam’s methods, like mine, were a bit extreme but altogether necessary. And lest you forget the culminating scene of *The Departed*, it’s Dignam that finally wins out and delivers on his promise.⁵⁸

In the final scene of *The Departed*, Dingam shoots and kills a corrupt police officer.

⁵⁵ @JohnnsonThought1, “Donald Trump Doesn’t Want to Win. Also Cleveland Rocks”, X Space Aug 18, 2024, 2:31 AM), <https://x.com/JohnsonThought1/status/1825026842849423596>.

⁵⁶ Charles Johnson, *Carl’s Lesson: What the SEC Fine Should Teach Other Compromised Billionaires*, Substack (Aug. 20, 2024), <https://charlesjohnson.substack.com/p/carls-lesson-what-the-sec-fine-should>.

⁵⁷ *Id.*

⁵⁸ *Id.*

86. On September 2, 2024, Johnson linked to an article about him on the Substack Blog called Tech Intel Stack from his X account⁵⁹

87. Tech Intel Stack posted an August 19, 2024 interview with Johnson. In the interview, Johnson explained how he and his co-conspirators made threats to businessmen:

[A] lot of companies are supporting governments, right? A lot of them, a lot of the ones that are valuable. At some stage, the US government comes in and takes over, and I am involved in that process of identifying the companies that are targets for takeover, and also involved in the process of putting a stake through the heart of companies that are not useful.

...

Yeah. So what happens a lot of the time is that people get in trouble with the US government for whatever, a whole lot of reasons.... And what happens is they're sent to me by people connected to the government or people who are, you know, wanting to clean them up in any meaningful way. ... But in general, there's a whole process by which a lot of these people get recruited and ... get sort of repurposed for Uncle Sam, and so I spend a lot of time on that process.

...

And then sometimes, you know, the US government will ask me to invest in a company that's compromised in some meaningful way, as a way of, like, keeping tabs on the company as an investor. So, I've done a lot of that over the years as well.⁶⁰

88. Johnson also threatened "consequences" for people unless they invest in the technology he tells them to, because he works "very closely with different three letter agencies":

[S]ometimes what you can do with front men is you can say, 'Hey, I know you're a front man, you should work with us and be helpful to us. **And if you're not, there's going to be a series of consequences for that behavior.**' ... [A] lot of what we'll do is we'll go and we'll try to recruit people that are fronts. And you'll see a lot of the time people get in trouble, and then they become very charitable,

⁵⁹ @JohnsonThought1, X (Sept. 2, 2024, 1:01 p.m.), <https://x.com/JohnsonThought1/status/1830652366334706097>.

⁶⁰ Jacob Cantwell, *Elon Musk's X Suspends Chuck Johnson for Not Being Enough of a Troll*, Substack (Sept. 2, 2024), <https://techintelstack.substack.com/p/elon-musks-x-suspends-chuck-johnson>.

right? ... [A] lot of what I do is I sort of go to these guys and say, ‘Listen, you know, you should be helpful to Uncle Sam. He’s been pretty good to you. You should invest in technology that Uncle Sam likes. And I happen to know what a lot of that technology is, **because I work very closely with different three letter agencies** that are interested in certain types of technology.’⁶¹

89. When asked to clarify what those “consequences” were, Johnson said “they get a target letter from the DOJ, or they start to have IRS issues, or suddenly their credit cards don’t work.”⁶²

90. Johnson further suggested that these “consequences” included his leaks to the media and his own tweets and blog posts, noting his adversaries “don’t like, you know, **their business being written about, say by you or me**, or by the *New York Times* or the *Wall Street Journal* or whatever. You know, **they want to have their reputation intact.**”⁶³ Johnson added, “And so if you start talking about, you know, what they’re investing in, and you start detailing, you know, a lot of the problems that these guys have, that becomes kind of more helpful as well.”⁶⁴

91. On Johnson’s since-deleted September 23, 2024 X Space, he made clear that if people ignored his “don’t fuck with me” threats, he could get them indicted, and through his “relationships with the intelligence community,” they could face IRS audits:

I’m like, listen, I warned you. I said, like, don’t try to cheat me. Don’t try to fuck me. ... [W]hat’s happened now is that there’s so many different players that have tried to fuck me, and what ends up happening is then they get indicted, or, like, their car doesn’t work, or, you know, like a whole slew of things start to happen to them. And frankly, it’s kind of fun.

...

⁶¹ *Id.* (emphasis added).

⁶² *Id.*

⁶³ *Id.* (emphasis added).

⁶⁴ *Id.*

Yeah, I mean, this is, this is kind of it in the main I think, by the way, what I try to do, I also have the ability to protect people, and I will go with people, and I will write a memo to myself, and I'll screenshot it, and I know, by the way, I'm like, right near the NSA campus today in Baltimore, and I'm going to be there tomorrow too.

...

I've had issues with the IRS in different ways, but because I have my relationships with the intelligence community, I would just call up the intelligence community and be like, 'Hey, you asked me to do this stuff. I try to pay my taxes the best I can. I think I'm doing it correctly. What do you think?' And what ends up happening a lot of the time is that what happened when I was audited is that the IRS shut down my audit. Actually, the IRS did an audit, and then they were like, trying to figure things out, and then the intelligence community shut down my audit.⁶⁵

92. In a November 9, 2023 "X" Space titled "Peter Thiel and me in The Atlantic," Johnson claimed that to get "right with the deep state," Thiel would have to invest in "technology that was in the national interest" including "my company."⁶⁶

D. Johnson teams up with Greenwill to perpetrate the scheme.

93. RICO co-conspirator Greenwill controls several businesses. He is the founder of GKG Capital Management, Eldar Capital, and Metis Capital. He also runs Gator Automotive, a full-service auto repair shop in Carbondale, Illinois; Central States Crane and Hoist, specializing in overhead-crane services in Tulsa, Oklahoma; and Machinery Service and Design, a Milwaukee-based manufacturer of hydraulic cylinder repair equipment.

94. From December 2010 to at least March 2018, Greenwill was the co-owner of Stratus Building Solutions of Kansas LLC, a commercial-cleaning firm that claimed to manage

⁶⁵ Exhibit 1 at I-G.

⁶⁶ @JohnsonThought1, "Peter Thiel and me in The Atlantic," X Space, (Nov. 9, 2023, 10:34 p.m.), <https://x.com/JohnsonThought1/status/1722820033414332675>. Exhibit 1 at I-B.

the cleaning of more than two million square feet of commercial real estate in Kansas City and its surrounding areas.

95. In 2012, Greenwill and Stratus were sued for civil RICO violations, with mail and wire fraud as the predicate crimes, in the U.S. District Court for the Eastern District of Missouri.

96. The complaint alleged that Greenwill and his co-defendants lured the plaintiffs (primarily Hispanics and other ethnic minorities) into purchasing commercial-cleaning franchises by making false promises about the profitability and support they would receive.

97. The district court ultimately ordered the case into arbitration without reaching the merits.⁶⁷

98. Greenwill works closely with Johnson and, like Johnson, frequently portrays himself as speaking for federal law enforcement agencies in their attempts to fraudulently secure investments from their targets via extortionate demands.

99. Greenwill and Johnson have several investment funds in which they both have interests. They have presented themselves as both being affiliated with the intelligence community to solicit investment from Plaintiff's network of investors.

100. In an August 19, 2024 interview, Johnson described Greenwill as "my business partner" and that "he and I do a lot of assessing together. Sometimes we'll be sent by specific countries. You know, or I'll be sent by allied countries."

101. Johnson added that Greenwill contributed to their joint effort to "clean up" targeted businesses because he has more influence with the government, or "headquarters":

I meet with a lot of people who are problematic, and I try to put them on the straight and narrow path. I try to explain to them why what they're doing is wrong in some cases, or figure out exactly what they're up to. And, you know, I have people that

⁶⁷ *Torres v. Simpatico, Inc.*, 995 F. Supp. 2d 1057, 1060 (E.D. Mo. 2014).

help me on some of that, as well. My business partner helps me on that a lot. He's kind of more headquarters-oriented.

[T]he way I look at it really simply is that I have this relationship with the U.S. government, with elements of it, different aspects of it. My colleague Gator ... he also has a relationship with them. And a lot of what we do is we go and we try to clean people up, while we also try to invest in technology companies that are helpful to making America stronger, safer, healthier place to live in.⁶⁸

102. Johnson further agreed with the description that Greenwill was the "bad cop" pressuring his targets to comply or suffer government retaliation: "That's right, me and Gator, and there are other people as well that act as a bad cop a lot of the time."⁶⁹

E. Johnson and Greenwill's RICO Shakedown Scheme extorts and defrauds Clearview AI and Point Bridge.

103. In 2016, Johnson became part owner of the facial-recognition company SmartChekr, which was designed to use its technology for "extreme opposition research" on political candidates.

104. In 2018, SmartChekr's other owners, Hoan Ton-That and Richard Schwartz, wound down SmartChekr and transferred the technology to Clearview AI, Inc., which they founded primarily to provide facial-recognition technology to law enforcement and other government agencies.

105. As part of the wind-down agreement, Johnson received equity in Clearview and a 10% sales commission on the gross revenue received by Clearview that he originated.

106. The agreement also included strong non-disclosure provisions like the following:

[A]t no time during the Restricted Period shall the Individuals or affiliates of the Individuals (including, in the case of Johnson, the Transferee) make, or cause or assist any other person to make any statement or other communication to any third

⁶⁸ Jacob Cantwell, *Elon Musk's X Suspends Chuck Johnson for Not Being Enough of a Troll*, Substack (Sept. 2, 2024), <https://techintelstack.substack.com/p/elon-musks-x-suspends-chuck-johnson>.

⁶⁹ *Id.*

party which impugns or attacks, or is otherwise critical of, the reputation, business or character of the Company, or any of its respective directors, officers, representatives, agents or employees.

107. After the formation of Clearview, Lambert became a Clearview investor and Board member.

108. In February 2020, Johnson and Greenwill met with Ton-That and Schwartz for dinner in New York City. Greenwill presented himself as having a CIA affiliation and said he could help with raising funds and government contracting.

109. Soon after that meeting, Greenwill sent a due diligence form to Clearview, claiming he had lined up investors interested in providing capital to Clearview. Completing and returning the form would have given Greenwill access to sensitive business information such as salaries, employee and contractor names, and information about government investigations and lawsuits.

110. Clearview did not return the form to Greenwill after its executives became wary of his involvement with Johnson.

111. In the fall of 2020, Clearview removed Johnson's access to its app, which was supposed to be limited to law enforcement officers. Johnson then started threatening the company.

112. In March 2021, Securiport—an aviation security contractor—began contract negotiations with Clearview. Johnson had introduced Securipoint to Clearview and would have received a contract-guaranteed commission. Johnson warned that the CIA would act against the company if it did not contract with Securiport.

113. On April 8, 2021, Johnson sent an email to Lambert, Schwartz, and Ton-That with the subject “Strong apologies re Clearview.” Even though he had previously claimed to have long been a government operative, he acknowledged that “you are absolutely right to limit the product to only responsible people and governments. I was wrong.”

114. Despite this superficially conciliatory tone, the email came immediately after Johnson's previous threats of CIA sanctions against the company. Echoing those threats, he cautioned, "You were introduced to . . . Gator Greenwill (CIA friendly) . . . for a reason. We need to hug the US government very closely. My fear for you is that you'll be crushed by the global forces arrayed against you. In the next bit you'll be contacted by the FBI about the Clearview hack and the role UAE played in it."⁷⁰ All three recipients of that email interpreted Johnson's claim to "fear for you" as a threat—sign with Securiport, or Johnson and Greenwill would convince the CIA to retaliate against them and Clearview.

115. In this email, Johnson repeatedly portrayed himself as a government operative close to the Biden Administration:

I'm working with our friends in the government a lot these days and want to do my part to help our country recover from the Trump years. I deeply regret the role I played in helping Trump be reelected. [sic] The role of foreign intelligence agencies in coopting our system of government these past four years is extremely disturbing to me and I am doing my part in seeing it done right. . . .

I also have been working with others with deep state ties who want to invest in Clearview.

I strongly encourage you to get closer to the US government and to relocate the company to Northern Virginia. This is bigger than all of us. It will require all of us to come together to help the country.⁷¹

116. Johnson had previously claimed that "I came mostly to Northern Virginia because of the Ukraine war. I got a call from people around the president, and so they, they asked me to move to Northern Virginia. Because of Ukraine conflict."⁷²

⁷⁰ *Id.*

⁷¹ *Id.*

⁷² Exhibit 1 at I-F.

117. On April 21, 2021, Johnson sent another email to Lambert, Schwartz, and Ton-That. He recommended “firing” the company’s current consultants and lawyers, including well-known First Amendment lawyer Floyd Abrams: “The deep state doesn’t trust Floyd Abrams. . . . He has an Israeli wife and he argued the Pentagon Papers for goodness sake. Daniel Ellsberg is widely thought to have been an Israeli spy.”

118. Once again, Johnson used the passive voice to suggest he was delivering a message from the U.S. Government:

You also need to make national security argument loudly and empathically or you will be defeated. This has been related to me often and emphatically.

The current view is that you aren’t sophisticated enough to understand the geopolitical problems Clearview is facing. I am trying at the highest levels of the government to help you but you seem not to get the message. Why? Is there anything you need to help you understand the gravity of what’s going on?

119. On August 11, 2021 Greenwill dined with Schwartz in New York City. Greenwill reiterated that he could raise money for Clearview, but seemed more interested in gaining intelligence about the company.

120. On January 26, 2022, Johnson sent an unsolicited text message to venture capitalist Gary Lauder, a Clearview investor and advisor. He told Lauder, “I hope you guys aren’t backing Hal Lambert.”

121. Lauder did not know who Lambert was. Johnson described him as “someone based in Texas. I don’t think Hoan [Ton-That] is going to survive for much longer either.” When Lauder asked for explanation, Johnson texted, “Time for changes at Clearview” based on “[f]raud, mostly. Have to change the leadership. Won’t be permitted to operate as it has been.”

122. Johnson urged Lauder to back an undisclosed takeover: “There’s an offer to acquire the company and have more responsible hands on the tech.” Johnson refused to identify these

“hands,” but said that the U.S. and U.K. governments “did not trust” Clearview leadership and that “people in the Biden administration” were “unhappy.”

123. When Lauder asked for anyone in the intelligence community to corroborate Johnson’s allegations about Lambert and Clearview, Johnson introduced him to Terry Dunmire, whom Johnson claimed would back him up. Johnson did not disclose that Greenwill and Dunmire were close business associates.

124. Based on his conversations with Dunmire, Lauder told Johnson he did not consider Johnson’s claims to be credible.

125. Johnson’s false accusations of fraud and false claims that the government would sanction Clearview for its ties to Lambert were designed to build support for his takeover attempt of the company.

126. On April 17, 2022, Johnson emailed Lambert, Schwartz, and Ton-That describing a “carrot and stick” approach to his gaining control of Clearview. Johnson’s “stick” was a lawsuit he planned to file against the company. “The carrot is an acquisition offer and/or more capital. Otherwise, my deep state lawyers will file this in court in about a week and I’ll be sending a copy of it to the media. (They’ll be some light edits.)”

127. Johnson attached to the email a draft complaint, which stated: “In or about March 2020, Ton-That also ignored Johnson’s colleague, Gator J. Greenwill, who along with Johnson, would provide valuable connections to the intelligence community.”

128. A year later, Johnson sued Clearview, Ton That, and Schwartz for breach of contract and unjust enrichment in the Southern District of New York.

129. The complaint alleged that “Johnson, who was also a confidential informant for the FBI, provided significant value to SmartCheckr through his relationships with the intelligence committee and law enforcement.”

130. Over the course of the litigation, Johnson was repeatedly admonished by Judge Katherine Polk Failla and his own attorneys to stop posting harassing messages about the defendants and defense counsel.

131. On July 12, 2023, Judge Failla wrote that “The Court is concerned about . . . whether it is Plaintiff’s intent to use his social media platform to intimidate defense counsel or otherwise interfere with this suit.”⁷³

132. After Johnson’s counsel again failed to prevent him from harassing the defendants and their attorneys online, on November 16, 2023, Judge Failla stated: “The Court remains dismayed by Plaintiff’s continued public posting about Defense counsel, Defendants, and this litigation generally; Plaintiff’s counsel’s apparent inability to impress upon Plaintiff the impropriety of his actions; and the amount of attention that Plaintiff’s behavior has required from this Court.”⁷⁴

133. On May 20, 2024, the Court granted the defendants’ motion to dismiss three of Johnson’s four claims.⁷⁵ The remaining breach-of-contract claim against Clearview stemmed from a disputed commission.

⁷³ Memo Endorsement at 2, ECF No. 22, *Johnson I* (July 12, 2023).

⁷⁴ Memo Endorsement at 2, ECF No. 39, *Johnson I* (Nov. 16, 2023).

⁷⁵ Opinion and Order at 2, 26, ECF No. 40, *Johnson I* (May 20, 2024).

134. On July 5, 2024, Clearview, Schwartz, and Ton-That filed a counterclaim against Johnson for breach of contract.⁷⁶ The litigation is ongoing.

135. Johnson repeatedly claimed his lawsuit against Clearview was brought on behalf and in coordination with the U.S. Government:

- On October 17, 2023, he posted on X, “You guys realize that the governments are lining up to run Clearview once it has responsible management right?”⁷⁷
- Discussing his lawsuit against Lambert and Clearview in an August 7, 2024 X Space, he said, “I’m in two lawsuits. One is with Clearview AI, which the US government encouraged me to do.”⁷⁸
- Discussing the same lawsuit in a March 26, 2024 Substack post, Johnson stated, “The cleaning up of these startup companies is going to be one of the big projects for counterintelligence going forward.”⁷⁹
- In a July 9, 2024 Substack post about hiring a new attorney, Johnson described the case as exposing Jewish criminals on behalf of the government: “The clandestine work I have done exposing criminal syndicates who hide behind the tragedy of the Jewish people speaks for itself and is well known to the law enforcement and intelligence communities of many countries. I’m proud of that work though I oftentimes don’t get to talk about it. Do I have specific beef with criminal Jews and their accomplices? You’re damn right I do.”⁸⁰

⁷⁶ Defs.’ First Am. Answer to Am. Compl. and Countercls. at 17–18, ECF No. 50, *Johnson v. Clearview AI, Inc.*, No. 1:23-cv-2441 (S.D.N.Y. July 5, 2024).

⁷⁷@JohnsonThought1, X (Oct. 7, 2023, 6:33 p.m.), <https://x.com/JohnsonThought1/status/1714409216805573119>.

⁷⁸ @JohnsonThought1, “Dangerous! Why I sent my texts.... Vance to the Washington Post,” X Space (Aug. 7, 2024, 1:05 p.m.), <https://x.com/JohnsonThought1/status/1821231218773708816>. See Exhibit 1 at I-D.

⁷⁹ Charles Johnson, “*The Ukrainians Are Obsessed with Clearview*”: Time Magazine Correspondent on the Facial Recognition Company Battlefield Deployment, Substack (Mar. 26, 2024), <https://charlesjohnson.substack.com/p/the-ukrainians-are-obsessed-with>.

⁸⁰ Charles Johnson, *A Quick Professional Update on The Clearview.AI Lawsuit*, Substack (July 9, 2024), <https://charlesjohnson.substack.com/p/a-quick-professional-update-on-the>.

- On September 16, 2024 Johnson posted on X a link to a press release titled “Justice Department Announces Five Cases Tied to Disruptive Technology Strike Force,” adding, “This doesn’t have to be your fate, Hoan Ton-That.”⁸¹
- On September 18, 2024, Johnson posted on X, “[This is coming for you, Hoan” while quote-tweeting a post about the French criminal charges against Telegram CEO Pavel Durov.⁸²

F. Johnson and Greenwill’s RICO Shakedown Scheme extorts and defrauds Umbra Space and Point Bridge.

136. In the spring of 2020, Point Bridge Capital began due diligence for an investment in Umbra Lab, Inc. (now Umbra Space), a Synthetic-aperture radar satellite company founded in 2013 and based in Santa Barbara California. Lambert arranged a visit to Umbra headquarters and met with their founders and toured their facilities. Point Bridge agreed to co-lead a Series A round of Umbra shares.

137. During this timeframe, Johnson introduced Lambert to Greenwill. They all met at a restaurant in Fort Worth. Greenwill presented himself as being associated with the CIA. Johnson and Greenwill pitched that Greenwill could be helpful in government contracts and fundraising for early-stage companies including Umbra who depended heavily on both government contracts and security approvals.

138. In the summer of 2020 Point Bridge Capital and Umbra Lab signed a term sheet. Point Bridge created a Special Purpose Vehicle called Point Bridge Capital VC, LP (“Point Bridge

⁸¹ @JohnsonThought1, X (Sept. 16, 2024, 6:33 p.m.), <https://x.com/JohnsonThought1/status/1835809170173657518>.

⁸² @JohnsonThought1, X (Sept. 18, 2024, 12:21 p.m.), <https://x.com/JohnsonThought1/status/1836440471029326228>.

SPV") and served as the General Partner to facilitate limited partner investments in the SPV. Point Bridge SPV invested approximately \$10,250,000 into Umbra.

139. In November 2020, near the close of the Series A, Johnson invested \$200,000 into Point Bridge SPV, less than two percent of its investment in Umbra. The investment was funded by venture capitalist Cyan Bannister. Johnson invested as a limited partner in the Point Bridge SPV, which Point Bridge created and in which Point Bridge served as General Partner.

140. Johnson and Point Bridge signed a subscription agreement detailing the terms of his investment in the Point Bridge SPV. The agreement expressly provided that Johnson had no control over the SPV or Umbra:

Lack of Control. Subject to the implementation of the investment limitations described in the Fund Agreement, the General Partner has complete discretion in managing the Fund's portfolio. The Subscriber will not make or participate in decisions with respect to the management, disposition or other realization of any investment made by the Fund or other decisions regarding the Fund's business and affairs.

141. The agreement includes a robust confidentiality provision: "The information provided in connection with the fund is confidential and proprietary"; the subscriber "has agreed not to disclose or use any of the information provided in connection with the fund except for the purpose of evaluating an investment in the fund" and has "agree[d] not to distribute that information to any other person or entity."

G. After Johnson's shakedown attempt, he retaliates, while claiming CIA and FBI support for his threats and frivolous lawsuits.

142. In the summer of 2021, Point Bridge began raising money for an additional round for Umbra. Johnson learned of this and demanded as much as \$100 million in Umbra shares.

143. On June 17, 2021, Johnson introduced Greenwill to Umbra executive Gabe Dominicello as someone with CIA ties. They met in person shortly thereafter. Greenwill claimed that he and Johnson could raise \$100 million for Umbra through his fund, Butler Capital.

144. In July 2021, after it became clear that Johnson’s demand for \$100 million in Umbra shares would not be met, Johnson told Dominicello that he was “with the Defense Department,” that he would ensure Umbra secured no government contracts, and that he would destroy the company. The executive cut off contact with Johnson after that.

145. In November 2021, Johnson asked Point Bridge if they were “doing the SPV together.” Lambert, on behalf of Point Bridge, responded by asking if he was joking.

146. On October 14, 2023, Johnson asked Point Bridge for money in a conciliatory-sounding email. Despite this tone, Johnson falsely described Umbra as if he had a part in its founding, calling it as “a great and important company that we have launched,” commenting that he was “proud that so many people share our original vision,” and claiming that was “responsible for this company’s launch and success.” He then asked for binding arbitration.

147. On October 16, 2023, Lambert responded for Point Bridge. While noting that the email contained “some very odd claims,” Lambert offered to discuss the issue by phone.

148. Three days later, Johnson emailed Point Bridge, through Lambert, a link to a tweet thread about Johnson’s involvement as an FBI informant and about claims that Peter Thiel was also a CHS. Johnson added, “This might also help you do the right thing.”

149. The tweet thread included an American Revolution “Join or Die” image and Johnson’s ultimatum “[t]o the rest of Silicon Valley, especially the bits controlled by [Israel Prime

Minister] Bibi [Netanyahu]: Enough of the blacklists. Enough of the grifting. Enough of the bullshit.”⁸³

150. The thread concluded with a link to Johnson’s Substack article about his supposed work as an FBI CHS and his relationship with Thiel. He bragged in the article about how he supposedly had facilitated leaks to the press and how he can foment government pressure:

Johnathan Buma and I stopped Elon Musk from giving billions in inflated stock to Igor Kurganov, a Russian poker player backed by the Chinese mob. We leaked that information to then *Wall Street Journal* reporter Rob Copeland though he left out the Chinese mob stuff. The news of Elon Musk’s ties to the Ukrainian mob and to Russian intelligence has made me convinced we did not do enough. Founders Fund has continued to back a series of con men rather than be a responsible venture firm, including leading a round into Neuralink. Either Peter Thiel is unable or unwilling to fix this problem at Founders Fund. I’d love to chat with the SEC about being a whistleblower here.⁸⁴

151. Johnson followed up with Lambert on October 22 by threatening to “escalate things.” Lambert responded by suggesting that their lawyers discuss the matter.

152. That same day, Johnson again threatened Point Bridge via Lambert: “I have already been in touch with law enforcement about your behavior. I want to be very clear with you that you were given a chance to do the right thing.”⁸⁵

153. Johnson’s comments about colluding with law enforcement and the media against Thiel, Founders Fund, and Musk were structured as a threat to Lambert that if he did not accede to Johnson’s demands, Johnson would engage in a similar strategy against Point Bridge.

⁸³@JohnsonThought1, X (Oct. 19, 2023, 9:50 a.m.), <https://x.com/JohnsonThought1/status/1715002544085475474>.

⁸⁴ Charles Johnson, *On My Extracurricular Activities, the Business Insider Thiel Story, and Founders Fund*, Substack (Oct. 19, 2023), <https://charlesjohnson.substack.com/p/on-my-extracurricular-activities>.

⁸⁵*Id.*

154. On October 23, 2024, Johnson emailed forty limited partners of Point Bridge’s Umbra SPV stating that he planned to sue Lambert: “Many of you know me already but a few of you I haven’t yet met. I am a 50 percent owner of the carry in the Umbra SPVs. . . . As many of you know, I introduced Hal to Umbra and created the opportunity for the SPV.”⁸⁶ None of these statements were true.

155. In that email, Johnson made vague personal allegations: “Discovery will bring the facts to the fore and highlight his history of this type of behavior as well as other personal conduct on Hal’s behalf which is disqualifying, including toward female founders.”⁸⁷

156. Johnson further accused Lambert of “leading the witnesses” and warned that “outreach could complicate matters with respect to individual investors and draw any of them deeper into this litigation.” He invited the investors to “avoid that risk” by “prevail[ing] upon [Lambert].” He then “apologize[d] in advance for any discovery efforts that you all may be affected by.”⁸⁸

157. Johnson also declared, “I’ve also spoken to law enforcement. (You might have already read about my work),” and linked to a Substack article discussing Johnson’s status as an FBI informant.⁸⁹

158. In short, Johnson falsely and illegally claimed government authority and threatened law enforcement action to extort funds from Point Bridge and Umbra. He escalated these threats

⁸⁶ *Id.*

⁸⁷ *Id.*

⁸⁸ *Id.*

⁸⁹ *Id.*

after filing his lawsuits against Lambert, lawsuits he claimed he filed at the instigation of the U.S. government.

159. On October 18, 2023, Johnson posted a screenshot of his planned lawsuit on X:

After many attempts to resolve this matter amicably I will be suing @MAGAindex [Lambert's X handle] for breach of contract over how he cheated me on the @umbraspace SPV on Monday. Hal Lambert is a big time DeSantis guy and a Clearview board member. I've notified investors and now I'm informing you ... More to come. Chatting with the SEC and others as well.⁹⁰

Charles Johnson's Thoughts & Adventures
@JohnsonThought1

After many attempts to resolve this matter amicably I will be suing @MAGAindex for breach of contract over how he cheated me on the @umbraspace SPV on Monday. Hal Lambert is a big time DeSantis guy and a Clearview board member. I've notified investors and now I'm informing you.

Plaintiff Charles C. Johnson, complaining of the acts of Defendants Hal Lambert and Point Bridge Capital, alleges and states the following:

PARTIES

- Charles C. Johnson is a citizen of Roanoke, Virginia domiciled in Fairfax County, Virginia.
- Hal Lambert is a citizen of Fort Worth, Tarrant County, Texas.
- Point Bridge Capital was incorporated, and is existing, under the laws of the state of Delaware. Point Bridge Capital's principal place of business is in the state of Texas.

JURISDICTION AND VENUE

- Subject matter jurisdiction over this matter is conferred upon and vested in this Court under 28 U.S.C. § 1332.
- This Court has personal jurisdiction over Defendants.

20. Plaintiff has suffered public embarrassment because of Defendants' actions. Plaintiff's credibility has been damaged with his investment network because of the fraudulent conduct of Defendants. As a result, Plaintiff has lost opportunity for other lucrative contracts because of his connection to Defendants' fraudulent conduct.

FIRST CLAIM FOR RELIEF
(Breach of Contract and Fraudulent Misrepresentation)

- Plaintiff re-alleges and incorporates the prior paragraphs of this Complaint as if fully set forth herein.

Unibra Lab were dependent on personnel working with the company who had significant contacts with the United States Intelligence Community, Department of Defense, and/or other Federal agencies.

- Defendants orally represented to Plaintiff's network of investors that their investment was subject to a "key man clause" in which Plaintiff's participation in Unibra reduced risk and improved the likelihood of successful return on their investment.

Plaintiff and Lambert Raised Significant Funds from Mr. Johnson's Investor Network
Fully set forth herein.

- Plaintiff has performed work for Defendants in the form of attracting investors, presenting their respective companies, and facilitating government contracts.
- As a direct and proximate result of the unjust enrichment by Defendants, Plaintiff was harmed in an amount exceeding \$75,000.

PRAYER FOR RELIEF
Wherefore Plaintiff, Charles C. Johnson, prays the Court for the following relief:

12:59 PM · Oct 28, 2023 · 13.9K Views

2 23 86 5

160. On October 31, 2023, Johnson filed a *pro se* lawsuit against Point Bridge and Lambert for breach of contract, fraudulent misrepresentation, and unjust enrichment in the U.S. District Court for the Eastern District of Virginia.

⁹⁰ @JohnsonThought1, X (Oct. 28, 2023, 12:59 p.m.), <https://x.com/JohnsonThought1/status/1718311532235514062>.

161. As noted above, Johnson described himself as a “federal operative” in the lawsuit.

162. The lawsuit contained many other claims based on Johnson’s purported government authority:

- He had an “an extensive network of investors, allowing [Point Bridge and Lambert] to avoid the entanglements of Silicon Valley investors who would be unable to pass security reviews by the United States Department of Defense and/or other Federal agencies in order to obtain lucrative contacts.”⁹¹
- Umbra was “dependent on personnel working with the company who had significant contacts with the United States Intelligence Community, Department of Defense, and/or other Federal agencies.”⁹²
- Without [Johnson]’s participation, Umbra Labs has been unable to capitalize on opportunities in the market for Federal Government contracts because the company lacks Plaintiff’s contacts and expertise.”⁹³

163. On November 5, 2023, Johnson hosted an X Space titled “Sorry not sorry your Israeli op just blew up,” where he discussed his lawsuit against Point Bridge and Lambert.⁹⁴

164. Johnson implied that the U.S. government (“Uncle Sam”) was supporting his lawsuit because it sought to “clean up” Lambert’s purported Russian ties:

Lambert’s gotten very close to the Russians. And we’re sort of going to clean up a lot of the American space industry over the next few months. I think what you’ll see over time, is the degree to which a lot of these fronts be they Emirati be they, be they Chinese be they Russian, be they Israeli, be they Chinese are going to get cleaned up by Uncle Sam and Cousin Nigel [*i.e.*, the U.K. government].⁹⁵

⁹¹ Compl. ¶ 10, *Johnson II*, No. 1:23-cv-1485.

⁹² Compl. ¶ 11.

⁹³ Compl. ¶19.

⁹⁴ @JohnsonThought1, “Sorry not sorry your Israeli op just blew up,”, X Space (Nov. 5, 2023, 10:24 PM), <https://x.com/JohnsonThought1/status/1721367964207743077>. Exhibit 1 at I-A.

⁹⁵ *Id.*

165. On November 20, 2023, Johnson hosted another X Space titled “Counterintel and OpenAI,” where he implied that Umbra investors were running a “mob bank.”⁹⁶ Upon information and belief, Johnson was referring to Lambert (who has no connection to any “mob bank”). Johnson further suggested that Lambert and others invested in Umbra as a deal to avoid SEC enforcement:

A way to think about this is how do we get people who are compromised, who are mobsters who are whatever, who have cash, that want to develop products and things that are in the national interest. And you know what ... sometimes you see this with people who get hit with the SEC notices, then they suddenly become super philanthropic. Sometimes you see it with people who invest, they seemingly are going about their life doing their thing. And they’re running like a mob bank, and then suddenly they become investors in ... I don’t know, satellite technology, or in you know, so and so on and so on. Right. So that’s real life. That’s how these things like really work.⁹⁷

166. Johnson continued to claim in this X Space that his lawsuits against Point Bridge and Clearview were blessed by the U.S. government and “deep state” to “clean up” these companies:

There’s this sense in which like, a lot of people go on to the boards of these companies, from the security services, or from the U.S. ‘Deep State,’ and they kind of spy on these companies to see if the company really needs to be cleaned up, if it needs to be shut down, if the CEO needs to change, you know, all that good stuff. And in some cases, you’ll see lawsuits, right. I’m currently in two such lawsuits right now. Where they, the US government, you know, tries to use proxies as a way of cleaning up these companies. You know, in my case, it’s a facial recognition company. And the other one is a satellite company. Now, one of the reasons, you know, these things sort of happen, the way they’re happening now, and the reason people are talking about them much more openly, is the days in which like the so called ‘Deep State’ was like way quieter.⁹⁸

⁹⁶ *Id.*

⁹⁷ @JohnsonThought1, “Counterintel and Open AI,” X Space (Nov. 20, 2023, 9:06 PM), <https://x.com/JohnsonThought1/status/1726784235485434110>. Exhibit 1 at I-C.

⁹⁸ *Id.*

167. On April 2, 2024, the Eastern District of Virginia dismissed Johnson's first lawsuit.⁹⁹

168. Almost three months later, Johnson filed a new complaint in the Eastern District of Virginia raising the same claims as in his original complaint.¹⁰⁰

169. Johnson repeatedly claimed that he had coordinated with the federal government and intelligence agencies in refiling his dismissed lawsuit.

170. On August 7, 2024, Johnson hosted an X Space titled "Dangerous! Why I sent my texts with J.D. Vance to the Washington Post." In that Space, Johnson claimed, "I got a call . . . from some CIA connections telling me that they'd like me to sue Hal Lambert."¹⁰¹ Upon information and belief, these "CIA connections" included Greenwill.

171. Johnson also claimed that his lawsuit was funded by the U.S. and unspecified "allied" governments: "I have effectively infinite money to litigate these matters. So you know this happens when the US government likes you, and . . . allied governments wanting to fund your legal defenses. So you know, I can basically go for forever."¹⁰²

172. Johnson falsely accused Lambert of sexual impropriety in this Space, stating,

- "Yeah, I mean, he grabs the tits of younger women that don't belong to him. He gets drunk, he causes trouble."
- "We do know that he likes to grope women that aren't his, you know, aren't his to grope."

⁹⁹ Order, ECF No. 8, *Johnson II* (Apr. 2, 2024).

¹⁰⁰ Compl., ECF No. 1, *Johnson III* (Jun. 28, 2024).

¹⁰¹ @JohnsonThought1, "Dangerous! Why I sent my texts.... Vance to the Washington Post", (Aug. 7, 2024, 1:05 PM) <https://x.com/JohnsonThought1/status/1821231218773708816>. Exhibit 1 at I-D.

¹⁰² *Id.*

These statements are false. Lambert is a happily married father and family man and does not “grop” or “grab the tits” of other women. Johnson’s accusation that Lambert groped women without their consent amounts to falsely accusing him of both a serious crime and serious sexual misconduct.

173. During the same X Space, Johnson falsely stated that Lambert is engaged in illegal financial activities, including acting as a front for “cartels” and “compromised cash.” Among the false statements Johnson broadcast to the world were:

- Lambert is a “front for a lot of the Russian activity and a lot of the compromised cash”;
- Lambert is “the kind of dirty player in Fort Worth, maybe a front for the cartels”
- “I knew that Lambert had a lot of connections with naughty players, like from foreign governments and whatnot”; and
- “Hal is very much tied in with the Russian world, particularly in the Russian and the COVID world, particularly operating in Texas.” These statements are entirely untrue and have no factual basis. Lambert has never had any involvement with Russian money, criminal organizations, or illegal financial activities.

174. These statements are entirely untrue and have no factual basis. Lambert has never had any involvement with Russian money, criminal organizations, or illegal financial activities.

175. On August 18, 2024, Johnson posted another X Space, titled “Donald Trump doesn’t want to Win. Also Cleveland Rocks.” According to X, 2.8 thousand users listened to this Space and 3,440 users viewed the tweet containing it.

176. In this X Space, Johnson falsely claimed that Lambert “sexually has assaulted some women at parties in Austin.”

177. This accusation is entirely false and fabricated and without any factual basis.

178. By broadcasting these false accusations on a global platform like Twitter, Johnson ensured that the defamatory statements reached a wide audience, causing significant harm to

Lambert's personal and professional reputation. The false allegations were made with the clear intent to damage Lambert's standing in the community, leading to emotional distress and a deterioration in both personal and professional relationships. To further exacerbate the harm, these false statements remain accessible to anyone on the internet, continuing to damage Lambert's reputation and subjecting Lambert to ongoing public scorn.

179. Accusing Lambert of sexually assaulting women is plainly accusing him of committing a serious crime and serious sexual misconduct.

180. During the same X Space, Johnson continued to falsely accuse Lambert of engaging in illegal financial activities:

- Johnson falsely claimed that Lambert "was involved with a lot of taking a lot of Israeli money, another kind of dirty money, into the Cruz super PAC in 2016 that he ran."
- Johnson falsely claimed that Lambert was a "front for the Russian world" and associated with the "Russian mob world."
- Johnson falsely claimed that there was "dirty money around [Lambert]."
- Johnson falsely claimed that Lambert "was going to bring in all this dirty Russian money."

181. These statements are entirely untrue and have no basis in fact. Lambert has never had any involvement with "Russian money," criminal organizations, or any illegal financial activities or illegal foreign campaign contributions.

182. By broadcasting these false and malicious statements to a global audience on X, Johnson acted with actual malice, intending to paint Lambert as a corrupt individual and to undermine Lambert's credibility and integrity. The baseless allegations about Lambert's involvement with Russian money not only falsely accuse him of criminal activity but also impugn his integrity as a reputable investor. And these defamatory statements remain publicly accessible

on the internet, perpetuating the damage to Lambert's reputation and subjecting Lambert to ongoing harm.

183. Accusing Lambert of involvement of being a "front" for the "mob world" and using "dirty money" is effectively accusing him of the crime of money laundering and adversely reflects on his fitness to conduct his business or trade.

184. During this X Space, Johnson acknowledged that he had no evidence for these allegations and prefaced his false statements by saying:

- "By the way, people want to impress me. Help me do a lot of research on Hal Lambert";
- "I want to know kind of more about him"; and
- "If I could have some whistleblowers there, that would be quite helpful."

185. These statements further show that Johnson acted with malice. At best, Johnson baselessly thought someone could come forward validating his claims. At worst, Johnson was inviting his supporters to help him fabricate further false allegations.

186. In the August 19, 2024 Substack interview with Tech Intel Stack, Johnson claimed that his "partner" (Greenwill) and "a few business associates" forced Lambert and Point Bridge to "invest" in certain ventures favored by the co-conspirators after the company was targeted by the IRS or SEC:

In the Hal Lambert lawsuit, over Umbra. We would get people who ... had like dirty money, and we would try to get them to invest in things like new satellite technology or whatever. In some cases, they would get in trouble with Uncle Sam. So ... I meet with a lot of people that are in trouble with the IRS, or the SEC, or whatever, and I try to get them to be more helpful to [the] United States.¹⁰³

187. In this interview, Johnson described his relationship with Lambert as an 'op':

¹⁰³ Cantwell, *Elon Musk's X Suspends Chuck Johnson for Not Being Enough of a Troll*, Substack.

And what Hal didn't know is that I had a lot of connections with the US government, and that there was an op being run, and the op was to get a lot of dirty money to be used for a lot of the American tech industry, and the basic events to take over these companies are to trap the money in these deals.¹⁰⁴

188. The interviewer then asked Johnson: "When you say trap the money in the deal . . . do you mean take over the vehicle that invest[s] in the company?" Johnson agreed:

That's right. So one way to think about ... Umbra [is that] Hal has no real say in the day to day operations of [U]mbra, and so there's all this money that's been invested in [U]mbra, but how will those guys ever get liquid? Under what terms do they get liquid? How many of them were investing because they're tied in with Russian mafia, or they're tied in with the Israelis, or maybe someone was forced to do it. There's all these questions there that you might ask. Each investor is a little different, but the company is doing quite well. It has, I think, nine or 10 satellites up in space, and what I'm going to be doing is basically suing to cleanup ... Hal's involvement in the company. ... [T]here's a long history of Hal being a predatory and bad actor. And so this lawsuit[']s an opportunity to clean a lot of that up

189. Johnson further explained that by suing Lambert, "we're cleaning up the satellite industry from the Russian and Israeli influences."¹⁰⁵

190. On August 26, 2024, Lambert contacted Johnson via email requesting that Johnson correct and retract the false and defamatory statements described above. Lambert wrote:

"Charles, it's been brought to my attention that on your X Spaces you accused me of having sexually assaulted women at parties in Austin; getting drunk and causing trouble, that I am a front for Russian money and interests and other dirty money; and that I may be a front for drug cartels."

He then provided links, which included the date and location of the defamatory statements, and continued:

"These are lies and the fact you ask your deranged fans to 'research' me and find a 'whistleblower' shows me that you know they are lies and you are fishing for someone to make up these lies. I am a married man with a

¹⁰⁴ *Id.*

¹⁰⁵ *Id.*

family and these lies undermine my family and business relationships. Stop lying about me and correct the record.”

191. That evening, Johnson responded by email: “Hal, Sue me.”
192. On August 29, 2024, Johnson posted screenshots of Lambert’s request for a correction publicly on X and added,

Hal Lambert, who started the MAGA ETF, should not have committed fraud against me in business nor mistreated lady founders nor taken money from foreign fronts as he cheated me out of Clearview and Umbra equity. I [heart emoji] discovery @MAGAindex!” [@MAGAIndex is Lambert’s X handle].

By the way, I’m currently suing Hal.

According to X, 1,716 users viewed this post.

193. In addition to repeating his false allegations of money laundering for “foreign fronts,” Johnson additionally accused Lambert of having “committed fraud against me in business.” This is false. Lambert has engaged honestly with Johnson and all others he has done business with.

194. Accusing Lambert of “fraud against me in business” is accusing him of committing a serious crime and adversely reflects on his fitness to conduct his business.

195. On September 17, 2024, the Eastern District of Virginia dismissed Johnson’s second lawsuit, this time with prejudice.¹⁰⁶

H. Johnson’s RICO Shakedown Scheme extorts other investors.

196. Point Bridge is aware of many other businessmen who have faced similar forms of extortion, harassment, and fraud from Johnson and his co-conspirators. Johnson has openly bragged about his conduct.

¹⁰⁶ Mem. Op. & Order, ECF No. 8, *Johnson III* (Sept. 17, 2024).

197. In the Substack interview with Tech Intel Stack, Johnson described meeting with tech investor Robert Friedland: “like, I’m the friendly face that talks to them before they get in trouble with the more or less friendly faces.” He claims that he told Friedland:

‘[N]ice to meet you, Robert. So nice to have dinner with you,’ whatever. ‘Let’s talk.’ So we talk for like, five, six hours. And then I say, ‘look, here’s what’s going to happen if you continue on the course of action that you’re on. ... the US government is not going to allow you to bring ... your goods into the United States.’ Or ... ‘you’re going to pay a higher tax.’ Or I sort of create these scenarios, or I tell them those scenarios, that others have for them, and I sort of try to give them off ramps so they can ... keep their money, and they can be patriotic and helpful to the United States.

198. Johnson engaged in the same pattern with Austin-based venture capitalist Joe Lonsdale.

199. In August 2024, Johnson circulated a text conversation he had with Lonsdale. In these messages, Johnson told Lonsdale was under investigation by the FBI, implicitly threatened Lonsdale for not being “on the right side of Uncle Sam,” and promised to help Lonsdale “get ... right with them.”

200. Johnson then warned that his “community” was also targeting Musk and Thiel and reiterated that he was “leaving a door open” to save Lonsdale from the FBI. Johnson cautioned Lonsdale that he shouldn’t “dismiss [this offer] in an arrogant kind of way.”

201. After Lonsdale ignored him, Johnson began threatening him with a law enforcement investigation.

202. In a Substack post, Johnson called for Lonsdale to be “shut down by the feds” and announced: “In the coming days I’ll be releasing my conversations with Joe Lonsdale and

explaining why he's uniquely a problem. I'll be chatting with journalists to see if they'll be responsible enough to cover that fraud. If not, I'll publish it here.”¹⁰⁷

203. In the Tech Intel Stack interview, Johnson claimed he had sent “a number of negative articles about Joe Lonsdale . . . to the FBI field office” and to Lonsdale’s “limited partners.”¹⁰⁸

204. On April 30, 2024, Johnson threatened Mike Benz, a former State Department official and conservative commentator critical of the U.S. intelligence agencies: “It’s time to turn yourself in, Mike.”¹⁰⁹

205. On October 2, 2024, Benz explained that he had “never met [Johnson], never interacted with him, and he somehow got my personal cell number and threatened me one morning with a text message out of nowhere that I would soon be thrown in prison.”¹¹⁰

206. On November 7, 2023, Johnson wrote on his Substack Blog about a “rumor” that Home Depot co-founder Bernie Marcus funded Benz:

The rumor is that Benz is funded by the Chisraeli network around Bernie Marcus. Marcus, of Home Depot fame, is where consumer goods from China, mob labor and Jewish finance meet. He is a big Netanyahu supporter as [is] his ally and consigliere Steve Hantler who doles out the funding.¹¹¹

¹⁰⁷ Charles Johnson, *The Joe Lonsdale Hustle Needs To Be Shut Down By The Feds*, Substack (Aug. 21, 2024), <https://charlesjohnson.substack.com/p/the-joe-lonsdale-hustle-needs-to>.

¹⁰⁸ Cantwell, *Elon Musk’s X Suspends Chuck Johnson for Not Being Enough of a Troll*, Substack.

¹⁰⁹ @MikeBenzCyber, X (Oct. 1, 2024, 2:25 p.m.), <https://x.com/MikeBenzCyber/status/1841182727971700812>.

¹¹⁰ *Id.*

¹¹¹ Charles Johnson, *On Constructs and Their Unmasking*, Substack (Nov. 7, 2023), <https://charlesjohnson.substack.com/p/on-constructs-and-their-unmasking>.

207. Acting on this “rumor,” on October 2, 2024, Johnson threatened Marcus and his family office advisor, Hantler. Johnson demanded that Marcus “shut down” Benz or be held “personally responsible.” Johnson purported to make this demand on behalf of “The American Deep State.”¹¹²

208. That same day, Johnson tweeted at Benz, “You are going to prison traitor,” and falsely accused him of marrying a “Hungarian prostitute.”¹¹³

209. Also on that day, Johnson texted Hantler, claiming to be working on behalf of the “intelligence community” to prevent them from donating to Benz. Johnson then posted a screenshot of the exchange on X.

Johnson: It’s time to stop funding Mike Benz

Hantler: What did Mike do or not do?

Johnson: He’s targeting the intelligence community. Can’t be allowed. We know about the Hungarian prostitute spy wife. Lots of other problems.

Hantler: I will look into this.

Johnson: Please do my community is asking me to get involved.¹¹⁴

I. After Point Bridge Files Lawsuit, Johnson Defames Lambert Again.

210. On October 16, 2024, Point Bridge filed this action against Johnson.

¹¹² @JohnsonThought1, X (Oct. 1, 2024, 3:24 a.m.), <https://x.com/JohnsonThought1/status/1841016255471337891>.

¹¹³ @JohnsonThought1, X (Oct. 1, 2024, 4:22 p.m.), <https://x.com/JohnsonThought1/status/1841212036300066990>

¹¹⁴ @JohnsonThought1, X (Oct. 1, 2024, 4:34 p.m.), <https://x.com/JohnsonThought1/status/1841215069163512279>.

211. Over the next few days, Johnson reiterated his false claims about Lambert committing fraud, being backed by hostile foreign governments and criminal enterprises, and engaging in sexual impropriety.

212. On October 16, 2024, Johnson posted on X that “Looks like elicitation by Mr. Lambert who is credibly accused of fraud with the MAGA ETF.”¹¹⁵ In a separate post that day, Johnson described the Point Bridge lawsuit as “a Quinn Emmanuel lawsuit from someone who is credibly accused of fraud by multiple founders.”¹¹⁶

213. On October 17, 2024, Johnson posted on X, “I welcome the opportunity to hold accountable a *foreign-backed, foreign-funded criminal defamation ring* which has targeted me in a frivolous lawsuit filed by a *fraudulent Texas businessman.*” [emphasis added]¹¹⁷

214. Also on October 17, 2024, Johnson posted on X, “Curious, curious that Hal Lambert did not mention my reporting about his lecherous behavior with female founders of companies....”¹¹⁸

215. On October 17, 2024, Johnson posted a Substack article entitled, “Last Gasp of A Criminal Syndicate: Why I Welcome The Lawfare Attacks Against Me: To be libeled by the Israeli-backed defamation squad is an honor indeed” discussing this lawsuit. It included numerous false claims about Lambert:

¹¹⁵ @JohnsonThought1, X (Oct. 16, 2024, 6:07 p.m.), <https://x.com/JohnsonThought1/status/1846674431889813748>.

¹¹⁶ @JohnsonThought1, X (Oct. 16, 2024, 5:02 p.m.), <https://x.com/JohnsonThought1/status/1846657939370577984>.

¹¹⁷ @JohnsonThought1, X (Oct. 17, 2024, 11:52 a.m.), <https://x.com/JohnsonThought1/status/1846942320869908682>.

¹¹⁸ @JohnsonThought1, X (Oct. 17, 2024, 12:18 a.m.), <https://x.com/JohnsonThought1/status/1846767761411788856>

- “I welcome the opportunity to hold accountable a foreign-backed, foreign-funded criminal defamation ring which has targeted me in a frivolous lawsuit filed by a fraudulent Texas businessman with whom I used to associate.”
- “I have amassed quite a lot of evidence of Lambert’s involvement with hostile foreign intelligence”
- “Mr. Lambert is a frequent target of law enforcement.”¹¹⁹

216. On October 23, 2024, Johnson posted a Substack article entitled, “Best Birthday Yet! A Foreign Compromised Millionaire is Backing a Frivolous Lawsuit Against Me: Why I don’t submit to foreign-compromised bullies.”¹²⁰ In this article, Johnson accused Lambert of committing “fraud,” engaging “womanizing, and being “rather lecherous” “despite being married.”

217. On October 23, 2024, Johnson made two posts in an X thread stating: “Do we still have that file about how Hal Lambert was a front for various foreign governments fam?” and “Do we @bugbombz?” The anonymous X account “@bugbombz” frequently reposts and interacts with Johnson’s content. This suggests Johnson’s may be conspiring with others to amplify false claims that Lambert is “compromised” which he uses to extort and defraud Lambert and Point Bridge.

218. All of these statements are false. Lambert is a faithful husband and father. Neither Lambert, MAGA ETF, nor any of its accused counterparts has not been credibly accused of fraud by anyone and is in good standing with all regulatory authorities. Lambert has no backing or

¹¹⁹ Charles Johnson, “*Last Gasp of a Criminal Syndicate*”: *Why I Welcome the Lawfare Against Me*, Substack (Oct. 17, 2024), <https://charlesjohnson.substack.com/p/last-gasp-of-a-criminal-syndicate>

¹²⁰ Charles Johnson, *Best Birthday Yet! A Foreign Compromised Millionaire is Backing a Frivolous Lawsuit Against Me*, Substack (Oct. 23, 2024), <https://charlesjohnson.substack.com/p/best-birthday-yet-a-foreign-compromised>.

relationships with foreign governments. The only “criminal defamation ring” that Lambert has ever had any association with was his past acquaintance with Johnson and Greenwill.

CAUSES OF ACTION

Count I: Civil RICO, 18 U.S.C. § 1962(c) (By All Plaintiffs)

219. Plaintiffs reallege each and every allegation set forth in the foregoing paragraphs by reference herein.

220. 18 U.S.C. § 1962(c) makes it “unlawful for any person employed by or associated with any enterprise engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise’s affairs through a pattern of racketeering activity or collection of unlawful debt.”

221. Defendant Johnson is a “person” within the meaning of 18 U.S.C. §§ 1961(3) and 1964(d).

222. Point Bridge is a “person” within the meaning of 18 U.S.C. § 1961(3) because it is an entity capable of holding legal or beneficial interest in property.

223. Johnson and Greenwill constituted the RICO Enterprise (“Enterprise”), as that term is defined in 18 U.S.C. § 1961(4), because they associated for the common purpose of profiting off the scheme to shake down and extort Point Bridge and other investors.

224. The Enterprise has an ongoing organization with an ascertainable structure and functions as a continuing unit with separate roles and responsibilities.

225. Johnson violated 18 U.S.C. § 1961(1) by engaging in a pattern of “racketeering activity” including the following predicate crimes:

- **Wire Fraud (18 U.S.C § 1343):** As detailed above, Johnson and co-conspirators used interstate wire communications, including text messages, emails, and social media posts, as part of a scheme to further the RICO Shakedown Scheme by defrauding others out of money via false and fraudulent claims that Johnson was a

government agent or had connections to government agencies and would use his status as a government agent or government connections to instigate sham law enforcement actions against his targets, including investigations, audits, and lawsuits, or else would publicize knowingly false claims of corruption and/or associations with foreign governments and the Mafia, if they did not give money to the Enterprise. Johnson knew that these wire communications would be transported interstate and knowingly and willfully initiated and participated in the RICO Shakedown Scheme.

- **Hobbs Act Extortion (18 U.S.C. § 1951):** As part of the RICO Shakedown Scheme, Johnson and his co-conspirators repeatedly attempted to portray themselves as having government authority in order to threaten their targets into giving money to the Enterprise.¹²¹ These threats were wrongful and included, *inter alia*, threats to initiate sham government investigations, audits, and other law enforcement actions based on Johnson's knowingly false claims of corruption and/or associations with foreign governments and the Mafia and threats to publicize these knowingly false claims. No law enforcement or intelligence official would have authority to make such claims or threats.
- **Theft under Texas Penal Code Title 7, Chapter 31¹²²:** As part of the RICO Shakedown Scheme, Johnson and his co-conspirators appropriated or attempted to appropriate money from their targets by means of deception and coercion, including by the false claim that Johnson was a government agent and would use his government connections to instigate sham law enforcement actions against his targets, including investigations, audits, and lawsuits, as well as wrongful threats that Johnson would publicize knowingly false claims of corruption and/or associations with foreign governments and the Mafia.

226. Johnson conducted and/or participated in the conduct of the Enterprises affairs, directly or indirectly, through a pattern of racketeering activity, in violation of 18 U.S.C. § 1962(c). He participated in the operation or management of the Enterprise by, among other things:

- Establishing a partnership with Greenwill whereby he and Greenwill falsely claimed to speak for federal law enforcement agencies in their attempts to fraudulently secure investments from and make extortionate demands on their

¹²¹ See *Evans v. United States*, 504 U.S. 255, 269 (1992) (noting that “extortion was understood as a wrongful taking under a false pretense of official right” and that Hobbs Act is far broader than this conception). The Hobbs Act also prohibits public officials from using the “coercive element” of “the public office itself” to demand money. *Id.* at 266.

¹²² See *Scheidler v. Nat'l Org. for Women, Inc.*, 537 U.S. 393, 410 (2003) (holding “state extortion offense for purposes of RICO” is “similar” to Hobbs Act).

targets;

- Selecting the entities and people that the Enterprise would target as part of the RICO Shakedown Scheme;
- Selecting the methods, means and strategies employed to further the RICO Shakedown Scheme;
- Coordinating communications between himself and his co-conspirators; and
- Making and publicizing threats to further the RICO Shakedown Scheme.

227. Johnson engaged in a scheme or artifice to defraud Point Bridge out of money by means of false or fraudulent pretenses, representations, or promises, including but not limited to claiming government authority to threaten law enforcement action unless funds were shifted to entities controlled by the Enterprise, and publicizing knowingly false allegations of corruption and ties to foreign governments and the Mafia when monies were not paid to the Enterprise. Johnson has no such authority, and it would be unlawful for someone who had such authority to make these promises or threats.

228. It was reasonably foreseeable that, in furtherance of the scheme to defraud, interstate wire communications would be used, and interstate wire communications were in fact used. Over a period of at least three years, Johnson caused to be transmitted by means of wire communication in interstate commerce numerous communications that were designed to defraud Plaintiffs, including but not limited to:

- The November 2020 wire transfer of \$200,000 into Point Bridge through venture capitalist Cyan Bannister;
- The January 26, 2022 text messages to Gary Lauder signaling a government-endorsed takeover of Clearview; and
- Emails and texts sent from Johnson and Greenwill to Point Bridge, Lambert, and Point Bridge's SPV limited partners making extortionate demands and threatening

retaliation by the government and leaks to the press about false and fraudulent claims.

229. Plaintiffs were directly injured and suffered damages to their business and property as a result of the predicate acts Johnson committed, including, among other things, legal fees, harm to business relationships, monetary losses, and damage to reputation and goodwill.

230. The acts of racketeering activity referred to in the previous paragraphs constitute a “pattern of racketeering activity” within the meaning of 18 U.S.C. § 1961(5). The acts alleged were related to each other by virtue of common participants, similarly situated victims, a common method of commission, and the common purpose of attempting to obtain investment and interests in the target companies mentioned herein.

231. There were multiple victims and targets of the Enterprise’s scheme, including Lambert, Point Bridge, Umbra Space, and Clearview. And Johnson has bragged about engaging in similar illegal conduct with his co-conspirator Greenwill to Robert Friedland and Joe Lonsdale.

232. Johnson has perpetrated the RICO Shakedown Scheme over the course of at least three years. As described herein, relevant communications took place over the course of several years, beginning in 2021 and extending to the present day.

233. Absent judicial intervention, Johnson will continue perpetrating the Enterprise’s shakedown scheme to the detriment of Plaintiffs and others.

234. The Enterprise’s conduct thus constitutes both a close-ended and open-ended pattern of racketeering conduct.

235. As a direct and proximate result of Johnson’s violations of 18 U.S.C. § 1962(c), Plaintiffs have been damaged in their business and property in an amount to be proven at trial, including, among other things, fees spent defending against extortion attempts, harm with investors, and business reputation. Because Point Bridge relies on its ability to raise capital for

future ventures and investment, the RICO Shakedown Scheme has impaired the company's ability to maximize returns and deploy capital.

236. As a result of Defendant's violation of 18 U.S.C. §§ 1962(c) and 1964(c), Plaintiffs are entitled to treble damages and the costs of suit, including reasonable attorney's fees.

Count II: Conspiracy to Commit Civil RICO Violations, 18 U.S.C. § 1962(d) (By All Plaintiffs)

237. Plaintiffs repeat and re-allege, as if fully set forth herein, the allegations of the foregoing paragraphs.

238. 18 U.S.C. § 1962(d) makes it "unlawful for any person to conspire to violate any of the provisions of subsection (a), (b), or (c) of [the RICO provision]."

239. Defendant Johnson is a "person" within the meaning of 18 U.S.C. §§ 1961(3) and 1964(d).

240. Point Bridge is a "person" within the meaning of 18 U.S.C. § 1961(3) because it is an entity capable of holding legal or beneficial interest in property.

241. Lambert is a "person" within the meaning of 18 U.S.C. § 1961(3).

242. Johnson and Greenwill constituted the Enterprise, as that term is defined in 18 U.S.C. § 1961(4), associated for the common purpose of profiting off the RICO Shakedown Scheme to shake down and extort Point Bridge and other investors.

243. The Enterprise has an ongoing organization with an ascertainable structure and functions as a continuing unit with separate roles and responsibilities.

244. Johnson and his co-conspirators also violated 18 U.S.C. § 1962(d) by willfully, knowingly, and unlawfully conspiring, combining, confederating, and agreeing together to participate in the RICO Shakedown Scheme to defraud and extort Point Bridge and other targets, in violation of 18 U.S.C. § 1962(d).

245. Johnson specifically intended and foresaw that the Enterprise would engage in, and conduct activities that affected, interstate commerce, as described above.

246. There were multiple victims and targets of the Enterprise's scheme, including Point Bridge, Umbra Space, and Clearview.

247. Johnson has perpetrated the RICO Shakedown Scheme over the course of at least three years and will continue the Shakedown Scheme in the future to the detriment of Plaintiffs and others absent judicial intervention.

248. Plaintiffs were injured in their business and property as a direct result of Johnson and his co-conspirators' violations of 18 U.S.C. § 1962(d), by, among other things, reductions in investment and other capital, monetary damages, fees spent defending against extortion attempts, damage to relationships with investors, and damage to its reputation, none of which would have happened but for the Enterprise RICO Shakedown Scheme. Because Point Bridge relies on the ability to raise capital for future ventures and investment, the RICO Shakedown Scheme has impaired the company's ability to maximize returns and deploy capital.

249. As a result of Defendant's violation of 18 U.S.C. §§ 1962(d), Plaintiffs are entitled to three-fold its damages and the costs of suit, including reasonable attorney's fees.

Count III: Breach of Contract (By Point Bridge)

250. Plaintiff Point Bridge repeats and re-alleges, as if fully set forth herein, the allegations of the foregoing paragraphs.

251. The Subscription Agreement constituted a valid and enforceable contract between Point Bridge and Johnson.

252. Under the terms of the contract, Johnson "agreed not to disclose or use any of the information provided in connection with the fund except for the purpose of evaluating an

investment in the fund,” and he further “agree[d] not to distribute that information to any other person or entity.”

253. Point Bridge has complied with all terms of the contract.

254. Johnson violated his duty by discussing the operations of the SPV and Umbra on many occasions, including on:

- His October 18, 2023 X post;
- His November 22, 2023 X Space;
- His August 7, 2024 X space;
- His August 18, 2024 X Space; and
- His August 19, 2024 Substack Interview.

255. Johnson’s breaches have proximately caused damage to Point Bridge by, among other things, undermining Point Bridge’s investments and its ability to obtain future funding.

256. Point Bridge has suffered and continues to suffer significant damages as set forth fully and specifically in this Complaint.

257. Due to Johnson’s breach of the contract, Point Bridge is entitled to judgment against him for an amount to be determined at trial, plus default interest, plus Point Bridge’s attorney’s fees and costs incurred in enforcing its rights under the contract.

Counts IV-XI: Defamation (By Lambert)

258. Plaintiff Lambert repeats and re-alleges, as if fully set forth herein, the allegations of the foregoing paragraphs.

259. The defamation claims against Johnson are:

Count	Date	Medium	Description
IV	August 7, 2024	X	Complaint ¶¶ 170-173
V	August 18, 2024	X	Complaint ¶¶ 175-184
VI	August 29, 2024	X	Complaint ¶¶ 192-194
VII	October 16, 2024	X	Complaint ¶ 212
VII	October 17, 2024	X	Complaint ¶ 213
IX	October 17, 2024	X	Complaint ¶ 215
X	October 17, 2024	Substack	Complaint ¶ 215
XI	October 23, 2024	Substack	Complaint ¶ 216

260. Defendant Johnson's false and defamatory statements, described above, constitute defamation under Texas law.

261. Johnson's false and defamatory statements, individually and collectively, are defamatory *per se*. "Accusing someone of a crime, of having a foul or loathsome disease, or of engaging in serious sexual misconduct are examples of defamation *per se*. Remarks that adversely reflect on a person's fitness to conduct his or her business or trade are also deemed defamatory *per se*."¹²³ Damages to Lambert are thus presumed as a matter of law.¹²⁴

262. Johnson published the false and defamatory statements, individually and collectively, without privilege and with actual malice, that is, with actual knowledge of falsity or a reckless disregard for truth or falsity.

¹²³ *In re Lipsky*, 460 S.W. 3d 579, 596 (Tex. 2015).

¹²⁴ *Id.*

263. Johnson intentionally and recklessly published the false and defamatory statements.

264. Johnson's false and defamatory Statements, individually and collectively, have exposed Lambert to hatred, contempt, ridicule, and/or obloquy and/or caused him to be shunned or avoided and/or have a tendency to injure him in his occupation.

265. Johnson has not corrected or retracted the false and defamatory statements, even after Lambert asked for a correction to mitigate damages.

266. Johnson published the false and defamatory statements without conducting a reasonable investigation, knowing them to be baseless. Acknowledging this, Johnson expressly invited his followers to "research" or become "whistleblowers" to support his unfounded allegations.

267. Johnson knew and foresaw that one probable consequence of publishing the false and defamatory statements was that those statements would be republished by others, and thanks to Johnson's many followers liking and re-sharing the statements on X, the foreseeable republication has in fact occurred, further amplifying and spreading the false and defamatory statements.

268. Johnson's false and defamatory statements directly and proximately caused substantial and permanent damage to Lambert.

269. Johnson's false and defamatory statements include statements that charged Lambert with crimes, imputed to Lambert want of chastity, and/or by natural consequence caused him actual damage. By way of example of such damages, Lambert is a prominent venture capitalist who raises capital from third party investors. Johnson's statements may have an adverse impact on the fund. As another example, Johnson's false accusation that Lambert is a money launderer for Russia may interfere with the ability of his government-contracting companies, including

Umbra and Clearview AI, to transact business with the U.S. Department of Defense. These contracts are worth billions. Johnson's liability could easily exceed \$10 million in actual damages, with a multiple of that in punitive damages.

DEMAND FOR JURY TRIAL

270. Plaintiffs demand a jury trial on all triable matters.

PRAYER FOR RELIEF

271. As a direct and proximate result of each of the above acts, Plaintiffs have suffered damage. They hereby seek all legal and equitable relief to which they are entitled, including the following:

- All actual damages resulting from Defendant Johnson's actions;
- Treble damages under RICO;
- All presumed and special damages as are allowed by law and, as applicable, to be proven at trial;
- An award of punitive and exemplary damages in such amount as may be awarded at trial;
- An Order requiring Johnson to retract the false and defamatory statements described herein, and a permanent injunction barring Johnson from rebroadcasting them;
- Injunctive and/or declaratory relief as deemed appropriate by the Court;
- Judgment for costs of the suit incurred, including attorney's fees;
- Interest on all such amounts permitted by law; and
- Such further legal and equitable relief as this court may deem proper.

Dated: October 28, 2024

Respectfully submitted,

/s/ Will Thompson
Will Thompson

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EXHIBIT 1

PARTIAL TRANSCRIPTS OF JOHNSON'S "X" SPACES

I-A. "Sorry not sorry your Israeli op just blew up"

November 5, 2023, available at <https://x.com/JohnsonThought1/status/1721367964207743077>,

0:07:49-0:08:46

Charles Johnson: On a personal note, I sued this guy, Hal Lambert, Hal Lambert and I started this SPV to do investing in a synthetic aperture radar satellite system. And I'll have more to say on that in the future. But Lambert's gotten very close to the Russians. And we're sort of going to clean up a lot of the American space industry over the next few months. I think what you'll see over time, is the degree to which a lot of these fronts be they Emirati be they be the Chinese made a Russian be the Israeli be the Chinese are going to get cleaned up by Uncle Sam and cousin Nigel. And then it gets all to the good. I also think it's gonna be interesting to see how the Mormon world works on this, because there's been a lot of approaches recently by the kind of Mormon deep state, that doesn't really have patience for the Chinese or the Russians or others kind of moving into their space. So I think that that's pretty encouraging to see the Mormons break, as they're breaking.

I-B. "Peter Thiel and me in The Atlantic"

November 9, 2023, <https://x.com/JohnsonThought1/status/1722820033414332675>.

0:10:43-0:11:33

Charles Johnson: Okay, so there's this line in the [Mattathias] Schwartz piece. 'Johnson told Insider told insider, he introduced Thiel to Buma then exposed him because Johnson felt betrayed that Thiel did not invest in Johnson's own startups, which he had expected to do in the exchange.' In fact, one of the conditions I made of helping Peter get right with the Deep State was that he and

Founders Fund would actually begin working on technology that was in the national interest, not just my company, but other companies as well. And that they would actually do rigorous due diligence on companies that they were funding. Unfortunately, that's not really the case, they've been funding a lot of like, Israeli connected or Russian connected, companies like Neuralink, which is a Musk property, which we can get into people are curious about that. Probably won't be talking too much about Musk in this piece.

I-C “Counterintel and Open AI,”

November 20, 2023, <https://x.com/JohnsonThought1/status/1721367964207743077>

0:17:44- 0:19:57

And the same thing is true of the United States, right, there are a group of families, like group of interests that exist in state after state, they really run these states, and really make decisions about how the state will operate and who will be in charge and all of that stuff. So when we kind of think about this, more and more as time goes on, and as we kind of engage more and more in this kind of in these kinds of decisions, you know, a way to think about this is how do we get people who are compromised, who are mobsters who or whatever, who have cash, that want to develop products and things that are in the national interest. And you know what, sometimes you see this with people get hit with the SEC notices, then they suddenly become super philanthropic. Sometimes you see it with people who invest, they seemingly are going about their life doing their thing. And they're running like a mob bank, and then suddenly they become investors, and I don't know, satellite technology, or in you know, so and so on and so on. Right. So that's real life. That's how these things like really work. And I think a way to think about this the way I've kind of come to think about this over the years is that the deep state and the mob intersect in all these like exquisite, interesting ways. And in some cases, they even intermarry, and there's lots of ways that

this sort of happens. I can call it a mob Intel pairing. And there's a lot more of that in the world than you would think. Right where she has the money. He has the political connections, Bada bing, bada boom, they're kids, they have kids, and it's sort of like that's sort of how that kind of works.

0:27:10-0:29:40

Now, Sam [Altman] had on his board at OpenAI, he had somebody by the name of Will Hurd, Will Hurd was a congressman or Republican congressman, who spoke fluent Urdu. And it was a very interesting figure, black man, I think he's a, he's like half black or something to that effect, representing the district along the Texas border, and Will Hurd sort of left office in part because that district is very kind of it's like a marginal district, it's like slightly Democrats some years later, Republican other years. Anyway, he left Congress, and he went and sort of tried to make some money for himself before running for president. And one of the things he did was he joined the board of OpenAI. And that, you know, he sort of was on the board, but he was also spying on it. And he ultimately left the board, God only knows what he kind of learned along the way. But there's this sense in which like, a lot of people go on to the boards of these companies, from the security services, or from the U.S. Deep State, and they kind of spy on these companies to see if the company really needs to be cleaned up, if it needs to be shut down, if the CEO needs to change, you know, all that good stuff. And in some cases, you'll see lawsuits, right. I'm currently in two such lawsuits right now. Where they, the US government, you know, tries to use proxies as a way of cleaning up these companies. You know, in my case, it's a facial recognition company. And the other one is a satellite company. Now, one of the reasons, you know, these things sort of happen, the way they're happening now, and the reason people are talking about them much more openly, is the days in which like the so-called Deep State was like way quieter. Those days are

kind of like not quite working anymore. Right? For many of us who grew up like who are millennials are Zoomers, God forbid, you kind of grew up in a world in which like, you had a phone around you what your most hormonal periods of your life. There's all this paper trail on you. And in the parlance of like U.S. Deep State, they call it 'ubiquitous technical surveillance.' Basically, all of us have cell phones around us, all of us have all these things in our home all around us at all times. And these things are very much engaged in different ways, you know, in our, in our homes, and they're very much like a big part of like, the world that we that we live in. And so that's kind of how to think about this.

I-D “Dangerous! Why I sent my texts.... Vance to the Washington Post”

August 7, 2024 <https://x.com/JohnsonThought1/status/1821231218773708816>

2:42:04 -2:50:13

X User:¹ Can you talk about your lawsuits again, like against like Clearview and Hal Lambert?

Charles Johnson: Yeah, I can. Long story short is I'm in two lawsuits. One is with Clearview AI, which the US government encouraged me to do both of these lawsuits, and both of them are kind of moving their way through the court system. I've been winning. I think both of them, I've been doing pretty well. I have something new to report on, the how Lambert lawsuit soon as concerning satellite technology. But yeah, it'll be, it'll be interesting when it all finally comes out. You know which will happen. There's a court date set, there's a trial date set for the Clearview AI, lawsuit in December, which I'm looking forward to. And yeah, in general, I'm pretty happy about how things are progressing in both of those cases.

¹ The “X user” is a listener to Johnson’s Space, who asked about the lawsuit. When replaying a Space, X does not give the name or username of the speakers other than the Host (in this case, Charles Johnson).

X User: And I guess, like, why? Why would the government be interested in pushing you on that? Like, why would the deep state want you to sue Hal Lambert and Clearview?

Charles Johnson: Oh, in the case of, I mean, Hal is a front for a lot of the Russian activity and a lot of the compromised cash. He was involved in the 2016 efforts with Ted Cruz. And how is the kind of dirty player in Fort Worth, maybe a front for the cartels that part, we're not totally sure of. We do know that he likes to grope women that aren't his, you know, aren't his to grope and, you know, it's it, yeah, so that's kind of fun. What can I say about that? I mean, it is, it is what it is. And then on the Clearview front, you know, I'm represented by Bernie Kleinman. Bernie Kleinman is the, you know, pro-American, Jewish CIA guy who is involved representing Khalid Sheik Mohammed back in the day. And Kleinman is a pretty good lawyer. People can look him up. I was represented previously by Alston Bird, but with changes in the UK, I thought it was a bad idea to be represented by the Tory law firm. And, yeah, I mean, I'll probably win both suits for what it's worth.

X User: And their stake in the game is like, basically that Hal Lambert is this, you know, unsavory character, and he has ties that are . . .

Charles Johnson: no Lambert. Lambert, Lambert, basically, yeah, so Lambert and I formed an SPV together where we'd split the carry on it. I knew that Lambert had a lot of connections with naughty players, like from foreign governments and whatnot, and so I allowed him to basically raise money from that network. He then tried to cheat me out of the SPV. I recommended that he not do that. He proceeded to try to do it. And then I got a call about a week later from some CIA connections telling me that they'd like me to sue Hal Lambert. So then I set about suing Hal Lambert. And Umbra, the company that I'm an investor in, the question is, how much of the economics of the company do I own? And that's a kind of interesting question, one that's going to

be resolved by the courts. So I either own, you know, \$5 or \$6 million worth of the stock, or I own something approximating, like 100 million plus of it, so we shall see.

X User: And that's part of, like, the same suit, or is that, like, a separate cause of it? Like, that's a separate cause of action, that's, that's in the lawsuit?

Charles Johnson: Yeah, that's in the lawsuit, or against Hal Lambert, and that'll come out more publicly as time goes on. Yeah, I'm grateful that you actually followed it and are paying attention to it, because a lot of people aren't paying attention to it. It's, it's kind of critically important, like, who owns the satellites that operate in Ukraine and elsewhere. And in the case of Hal, you know, Hal is very much, you know, tied in with the, with the Russian world, particularly in the Russian and Likud world, particularly operating in Texas. And, you know, there's photos of how going to Malta, meeting with strange people there. So, yeah, that's going to be a kind of interesting angle as time goes on.

X user: But I assume that might not come out explicitly in the lawsuit, right? Like your lawyers are going to protect, like, what evidence is presented?

Charles Johnson: I don't know what will come out explicitly in the lawsuit. I'm not sure it could. I don't know. Yeah, I intend to bring it out, and I intend to there's a journalist that wants to sit down and interview me for both suits, and I'll go through both of them and explain what really happened. And you know, I'm not really worried about either lawsuit. I seem to be winning in both cases. So

X User: Got it. And then if I know journalists were interested in reaching out to you, is that something that you'd be amenable to?

Charles Johnson: Sure? I mean, my DMs are open. I mean, it sort of depends on the context, and if I've given the story to somebody else, and it also depends on the types of work that people have done before. You know, I find that some people are not very capable at reporting these things

straight, or actually work for other countries, or whatever. So sometimes I don't really engage on it, but anything I say publicly, feel free to quote or use or whatever. Things are oftentimes more complicated, but I can't necessarily give the full story on everything, because sometimes they're active operations, as is the case with on the Umbra thing. I think it's kind of more I think when the Ukraine war ends, which I think will be sooner rather than later. You know, my general sense is that when the Ukraine war ends, a lot of these things are going to get shaped in different ways. So and then there's also the aspect of certain foreign governments are backers of some of these companies that are allied with the U.S., but not necessarily hardcore allied, and maybe they'll pay me to go away. And that's certainly an aspect of this as well, well,

X User: Because it's like, because Umbra itself is, like, one of the more successful of the defense tech like startups, right? Like they're still working?

Charles Johnson: Correct. And a big reason it's and a big reason it's one of the more successful ones, is because the involvement of your involvement of yours truly. So yeah, I'm quite proud of the role I played in cleaning up Umbra and moving Umbra into a position where it could be used in its, uh, offensive and defensive capabilities.

X User: And the only risk is this Hal Lambert I'm just, I've seen Hal Lambert on Fox News, and I just, I'm curious, like, what kind of guy this guy is.

I-E “Why they attack Fuentes what he gets right and what he gets wrong”,

Aug. 15, 2024, <https://x.com/JohnsonThought1/status/1824287854584836479>

0:35:36-0:37:27

“You know, what does it mean to be a fed? I'm not trying to be a dick about this. I'm generally people mean different things about it when they ask about it, when they talk about it. Right now,

you know, I have had a relationship with the Federal Bureau of Investigations and the NSA since I was 17 years old. I'm now 35 years old. Couldn't vote, right? Couldn't join the military without permission. But, you know, I ended up having a relationship with both of these three letter agencies and through blood. You know, I had a relationship with the CIA and the Office of Naval Intelligence, you know, which I didn't choose. You know, you exist in the context in which you reside. Right? What do you think you fell out of a coconut tree? So my point generally, is that for a lot of us, Uncle Sam knocks on the door and you say, 'All right, come on in. Uncle Sam, like, you know you want a coffee or something?' and they come to you and they ask you for help. And if you're smart or you're weird or you're interesting or whatever, they knock on your door a lot of a lot more frequently. And if you aren't super keen and super good at paying your taxes. Maybe you answer their door a little more frequently, like I did, you know, late at various stages of my life. So I don't think it's snitching. Snitching, quote, unquote. Now ask yourself, why certain countries that were involved in, say, maybe causing January 6, why they don't want people to actually be helpful to law enforcement and getting to the bottom of what was going on on January 6, and ask yourself this other question, which is, how many of the Feds actually are compromised and work for foreign governments? And I suspect the answer is quite a lot. And when you kind of look at a Charles McGonigal, I mean, we could go down the list of all these counterintelligence people for years who've worked either for the Israelis, officially or de facto, the Russians, this way or that. I mean, it's the thing you notice."

I-F “Donald Trump Doesn't Want to Win. Also Cleveland Rocks”.

August 18, 2024, <https://x.com/JohnsonThought1/status/1825026842849423596>

0:14:03-0:16:20

Charles Johnson: I have a lot of relationships with US government, and they, they tell me to, like, look at certain things, and I take people out to dinner when I live in, you know, when I'm in Northern Virginia, which I genuinely really hate, like, just being blunt about it, it has, it says, its virtues, but basically, I don't like the HOA style of Northern Virginia and Fairfax County, where everyone has the same haircut and like, jogs and drives the same color car and like, fucks the same type of woman. It's just the whole place feels very awkward to me. I'm just not into it. And there's not it's not very entrepreneurial, and everyone makes, like, 15 grand a month, you know, being a lobbyist. Or they make, like, \$125,000 a year, as, like, you know, whatever, working in some government office or whatever. So I came, I came mostly to Northern Virginia because of the Ukraine war. I got a call from people around the president, and so they, they asked me to move to Northern Virginia. Because of Ukraine conflict. So I didn't have a good enough excuse. I was living in Texas at the time, so just got in my car and I drove, you know, to Northern Virginia. And I've been here basically six weeks before the Ukraine war broke out. And I, you know, it's interesting. I get to meet a lot of people the State Department. I get to meet people the Department of Energy, you know.

X User: And they ask you, like, hey, like, these people are dangerous? You should meet with them. Tell us if they're actually, like a risk?

Charles Johnson: I think that, I know this is gonna sound very fucked up and kind of weird, but I think I'm supposed to be, you know, the new Epstein. So I think Epstein was, like, involved in doing a lot of technology and new technology development. And there's always been these, like, figures who are, like, kind of private sector, kind of public sector, that are very good at, like, investing in new technologies as they were coming out. And so, you know, I think that that's kind of what I'm supposed to be doing. And, you know, I this guy Scott today that I met with, you know, the the, yeah, the Department of Energy, the Department of Transportation, they're all, like, super into E bikes. But, you know, basically the Chinese are the ones who manufacture all the E bikes, and we can't be having that. So now we have to kind of come up with an American alternative.

1:29:21-1:32:08

Charles Johnson: You know, the company Umbra that I backed was a satellite company. I'm suing one of the guys who did the SPV with me, because he's a front for the Russian world and, sort of the Russian mob world. His name is Hal Lambert. By the way, if people want to impress me, help me do a lot of research on how Lambert, because there's a lot of, like, dirty money around Hal that's been going on. The US government asked me to do it, SPV with Hal Lambert, because they knew that he was going to bring in all this dirty Russian money. So I'm now suing him in federal court in Virginia, and I've been winning, you know, I've actually been representing myself. I, I was going to hire a lawyer, but I actually like, just wrote out the complaint and I gave it to a lawyer friend of mine who's in the Intel world, and he's like, 'dude, just file this yourself.' Like, you don't even need to hire a lawyer. And I was like, 'okay' so I filed it, and the judge has, like, agreed with me on a number of things there. And, you know, Thiel was, or, excuse me, , Hal Lambert was kind of dodging process servers and all this other stuff, which was kind of crazy, but, um, but, yeah, so I'm suing him, and I'm suing, uh, Hoan Thon That and clear view. And I've been that one. I'm represented by Bernie Kleinman, who was the same attorney who represented Dan Bilzerian's father Paul Bilzerian, as well as represented Khalid Sheik Mohammed. So I have that in common with yeah, I have a lawyer in common with them. And anyway, but yeah,

X User: What kind of research would you want?

Charles Johnson. I want to know all about his financial interests? I want to know kind of more about him. I know that he's I know that he sexually has assaulted some women at parties in Austin, so if I could have some whistleblowers there, that would be quite helpful. I also know that, you know, he was involved with a lot of taking a lot of Israeli money, another kind of dirty money, into the Cruz super PAC in 2016 that he ran. I know that he's been very friendly with Sergio Gor, and that he went with Sergio Gor to Malta, of all places. So I know I'm going to win the lawsuit. You know, it's just sort of a question of, like, how badly am I going to win. But yeah, so I'm a backer of this company, Umbra, which is a synthetic aperture radar

satellite company, and, you know, put it, put a bunch of money into that company, and it's been used, you know, in the Ukraine effort and in other parts, you know, other sort of conflicts around the world. There's sort of more that I know and have sort of figured out about Umbra than I could maybe talk about in a public space, that all of which is very good about the technology, but, but, yeah, I think it's, it's a very interesting kind of company, how it operates and, and how it's useful to the US intelligence community and to that of our allies. And of course, so I'm grateful, in a way, that that, that the Umbra satellites could go up on this, on the on, you know, on the SpaceX rockets.

I-G. “The collapse of the FBI, sensors, Nick Fuentes and power”

September 23, 2024. <https://x.com/JohnsonThought1/status/1838080187046482109> (Deleted)

Johnson later acknowledged deleting it. See @JohnsonThought1, X (Sept. 24, 2024, 11:38 a.m.), <https://x.com/JohnsonThought1/status/1838603979518869927>.

Charles Johnson's Thoughts & Adventure: @JohnsonThought1 · Sep 23 ...
We will do a space in ten minutes.

B_wary 🇺🇦🌴狳🦋🐢 @BrendaW77441194 · Sep 24
What happened to the recording of the Space??
I saved a link bc I can never hear until it is no longer live. Now it is gone??

Charles Johnson's Thoughts & Adventures
@JohnsonThought1

Deleted it.

11:38 AM · Sep 24, 2024 · 115 Views

0:46:38- 0:58:35

Charles Johnson: Now, one of the compromised FBI agents I met said, you know, 'we can't figure out what's going on with you. We can't figure out what's going on with you. Because what seems to be happening is that there's all these famous people that you know, and there's all these like, politicians, billionaires, and you just order them around.' And I'm like, 'Uh huh. Like, doesn't everybody do that? Like, don't you?' And what sort of happened was they didn't quite understand what was going on. Now, I think some of it comes from my family Navy connections, some of it comes from the CIA connection. Some of it comes from the Russian connections. But it is true that I have a kind of imperious nature. I'm usually right about things, and I've also protected a lot of people over the years, because I'll learn things that they don't necessarily know, things that might come after them or hurt them, or I might pick up on something, and I'll usually just call them

and be like, 'Hey, this is what's up', like these are and I just do this. I do it because I like it when people do it for me, and I do it because it's also like, I think the right thing to do. And but what's interesting about it is that most very rich people and most powerful people are not used to people just helping them without any expectation of anything in return, and so it freaks them out. And you build a friendship or an alliance that way. And so I have all these networks of people all around the country, increasingly around the world, in very different walks of life, in different communities. I try to have Matt Gaetz, one time said that there are no four corners to the Charles Johnson empire. And I think he was trying to make fun of me, but I'll take it, you know, like, if there's somebody I need to reach in the world that can usually reach them pretty quickly. Now anyway, why do I bring all this up? Well, one of the things I talked a lot about with NSA friends and with other friends is that, like a lot of our children, are getting targeted in different ways. They're either getting abused and molested, you know, by enemy actions, enemy actors. You know, lots of there's lots of child molesters here that have been sent here by other countries. You know, they don't want to host them in their own countries, so they'll send them here as a kind of punishment to us, there's a lot of people who get mistreated by, you know, people who are rendered crazy by social media and by technology generally. And of course, there's lots of abuses that go on of foreign actors targeting people through their iPhones, sending their DMS, you know, trying to blackmail them, trying to extort them. We talked about this the other night with Olivia Nuzzi, like she was clearly trying to compromise RFK Jr. in some kind of way by sending him nude photos. And by the way, I have had this happen to me with such regularity by so many different types of women that belong to different intelligence services that it's kind of become a joke like and I don't know what to do about it, because if I screenshot it and somehow those photos leak, then I'm like, guilty of revenge porn, right? So it's like, what do I do? How do I protect myself in

these situations? It's very unclear. I've had my phones hacked many, many times. I've sometimes deliberately put myself in positions where I know my phones will be hacked, so that's been a very interesting development. And then one of the other things that I do a lot is I will signal things with, like the food choices I have books I'm reading some of it, I'll signal on Twitter. So that's why, like many of you, don't know what the fuck I'm talking about on Twitter a lot of the time, and it's not your fault, you know, it's not really for you, it's for people who are smart enough. I'm trying to build basically a group of people that are intelligent enough where we can work on these problems together, and that way I don't really need to do it. I can go do other things. I can work on, you know, other technology projects I'm interested in. I have a lot of interests, basically, and I have, unfortunately, don't have, you know, if I live as long as my grandparents, like, I'm into my 90s, but like I'm in my mid 30s now, and I'm starting to feel I'm not as energetic as I was in my 20s. Shall we say? So anyway, I've also had people try to kill me many times because of who I am and what I represent and who have set traps for me in different countries. In the United States, I've had women on dating sites that turn out to be foreign spies. I've had women try to have sex with me, basically, like quasi rape me in different ways over the course of my life, which is why I'm constantly changing girlfriends, people have noticed that. And, yeah, it's a real issue. I've had, oh, I've also had people. I've also had men try to rape me. Not that I'm not there's anything wrong with being gay, but not despite, like many people who say I am. Wish that I were honestly because, like, a lot of life would be a lot easier. But anyway, so all of which is to say, and by the way, when I was talking to Jonathan Buma at the LA field office, you know, he talked about how he was molested when he was younger. You know, I've had a lot of people like who come to me, who tried to victimize me in different ways, how they themselves were victimized. So I'm more sympathetic to a lot of people I try to you'll notice, with a lot of my work, I'm not terribly vengeful.

Like, I will tell people like, Hey, don't attack me. Like, don't do it. And then they'll try to attack me or fuck with me in different ways. No, this is not an acceptable thing for you to do. And then what will happen is various bad things will happen to them, because clearly the NSA and other players are watching over my shoulder as I'm being attacked, and you know, then they get really mad at me, and I'm like, 'listen, I warned you. I said, like, don't try to cheat me. Don't try to fuck me.' And but what's happened now is that there's so many different players that have tried to fuck me, and what ends up happening is then they get indicted, or, like, their car doesn't work, or, you know, like a whole slew of things start to happen to them. And frankly, it's kind of fun. And so I have this, it's sort of like, it's like the man in the chair, you know, from, like the Spider Man movies, or whatever. It's kind of like that, just like going about my day to day business, and I've I try to recruit people, and I try to help people in different ways, because people try to help me, and I think it's the right thing to do. And I think because of my background, I'm able to go and talk with people that no one else can really talk to, and I can talk to them authoritatively. I can talk to them in a kind of, you know, friendly fetish kind of way. Now you'll see these people, like, attack me and they call me a Fed, or they call me this or whatever, and I'm like, Yeah, I'm a patriotic fed, yeah. Like, what are you going to do about it? And they because what they want to do is they want to tweet it to you behind avatars. This is, by the way, why I've also doxed a lot of these people. I was like, they want to attack people behind a screen they want to harm people, and many times, you know, we find out they're foreign intelligence. You know, they used to run a lot of intelligence assets in the United States, but now they can't do that anymore, because we're detecting it and it's illegal. So what they do is they run them from Canada or from Australia or places that are like similar language, type you don't necessarily even need, you know, there's some good reports out there. I think the Thesis folks did a good one. I just see Trundra in here. I tweeted it out, you know.

But I can just tell you my experience, by the way, too, is, if you work on technical questions, you will find a lot of people will try to steal things off of your phone and then try to replicate it themselves. So there's a whole number of countries, the Deseret world, the kind of Utah world that we talked about. There's certainly the Israeli world, certainly parts of the Russian world. And you know, the Russian world is not a monolith, you know, like, it has a lot of divisions. And these divisions, you know, even among the Russian aristocracy, the Russian Jewish mafia has a lot of distinctions. You know, there's a lot a lot of different distinctions that I think are often lost in these discussions. And we should also be a little leery and weary of people who sanction people, because what ends up happening is they ultimately create, you know, every time. You sanction somebody, you create a black market. And there are many players that actually control these black markets in different ways. And so we should be sort of mindful of, like, the rush on this stuff. He was trying to think, what else could I say about this? Yeah, I mean, this is, this is kind of it in the main I think, by the way, what I try to do, I also have the ability to protect people, and I will go with people, and I will write a memo to myself, and I'll screenshot it, and I know, by the way, I'm like, right near the NSA campus today in Baltimore, and I'm going to be there tomorrow too. And for what it's worth, I am moving to California to live full time in LA because I've been sort of instructed, but my family and others that are in the Baltimore area, they're taking over my operations here. And so anyway, what was he gonna say about this? Yeah. So what ends up happening is, you have these people meet with you for lunch, or whatever, journalists, reporters who are spies of different countries, and you know, they try to fuck me in different ways. I'm like, no, no, you don't want to do that. Olivia Nuzzi, no, no, you don't want to do this. And bad things start happening to them, and then they get really angry with me, and I try to explain to them like, no, no, you can't, you can't do this. Like, this is not how is this supposed to go? And I think they, you know, like Zav

Shalev has gotten very upset with me. I've had so many of these things over the years, and they all thought that I, like, worked for Peter Thiel. And I kept telling them, No, no, Peter Thiel works for me. And they're like, that's crazy, like he's a billionaire, and like, you're too dumb to understand what I'm talking about. And, you know, they don't. They don't understand the relationship of, like, the CIA to the German immigrants that came over. They don't. They just don't understand a lot of things.

And, you know, they, what they tried to do is they tried to, like, the Israeli world, you know, the IDF world, tried to smear me as a Holocaust denier. Now, I didn't really care all that much about it, because I was busy on other projects. But then various women I would date or mess about with would like, Wikipedia, Wikipedia me and be like, Are you a Holocaust denier? And I'd be like, no, like, you know, Shoshana, or whatever Jewish chick I was seeing at the time, but they wouldn't believe me. They'd be like, Oh, it's on Wikipedia, or it's in The Daily Beast, it must be true. I'm like, Oh, my God. Like, Barry Diller, and then you try to explain it to these people, and they think you're crazy, even though everything you're telling them is correct, right, Barry. So you end up in these situations where you're, like, fighting these fake versions of yourself, which is a major reason I started doing these spaces and writing my sub stack. And I also did it because, like, I can kind of take a lot of the psychological warfare that other people, like, seemingly can't take. And I think it's just, I don't know what it is about myself. Like, I kind of, I'm just, I can handle it. I don't know. It's just, it's something I've always wondered about myself. But, like, I don't, I don't really get bothered by it. And what ends up happening is, you know, I'll meet these people, journalists will introduce errors into our stories, and I'll be like, don't introduce that error into the story. And they'll be like, you know, like at Matthias, Schwartz at Business Insider "yeah, don't do it." And they do, and then, like, bad things will start happening. And I'm like, "Okay, well, like, I told you to be

accurate about this story, and you weren't accurate, and I told you to be accurate, and you weren't accurate, and now you're in trouble, and now you're like, losing your job, or you can't get a job in media or whatever." So there's all these ways in which everyone, like, however much money you think you have, right? It's only as good as your ability to use your credit cards or your debit card, okay?

1:08:11-1:13:25

Charles Johnson: Doug Emhoff represented an Armenian arms dealer who was moving guns, I think, from Bulgaria into a Black Africa, and particularly into Nigeria for the forces to fight Boko Haram. And he was indicted by the Bill Barr administration, Bill Barr DOJ. And he was somebody I actually met like on different occasions in the Fresno area. This guy, Ara Dolarian, is his name, and he was represented by Doug Emhoff, and Doug Emhoff got him out of trouble. And this has kind of, you know, made me, made me think a lot about the kind of political persecutions that seem to always fall favor Israeli or Opus Dei or Mormon interests in the DOJ. And I know many, many examples of various stings these folks tried to do on people like myself, people like other friends of mine. And in fact, in many cases, I kind of knew that there were efforts to sting me, so I stung the people trying to sting me, and sort of then they got in trouble. And so when I recommend to people, a lot of the time, is, if you're ever in one of those situations, try to be unpredictable. Try to be like something where they can't necessarily, you know, grasp your what your intent is, and try to take a lot of notes and a lot, keep a lot of records. So anyway, because I've had this, like, weird relationship with these two different communities that have always, like, tried to help me in weird ways and giving me money. I've had issues with the IRS in different ways, but because I have my relationships with the intelligence community, I would just call up the intelligence community and be like, 'Hey, you asked me to do this stuff. I try to pay my taxes

the best I can. I think I'm doing it correctly. What do you think?" And. And what ends up happening a lot of the time is that what happened when I was audited is that the IRS shut down my audit. Actually, the IRS did an audit, and then they were like, trying to figure things out, and then the intelligence community shut down my audit. It was just like, shut down. And then I got a letter in the mail from the IRS apologizing for inconveniencing me, which I thought was kind of crazy anyway. Why do I bring all this up? Well, I bring all of it up because I think that people are starting to detect that there's a lot of weird stuff going on now, and there's a lot of weird stuff that you know. There there's a lot of weird things that have been happening to me, and similar weird things have happened to Nick Fuentes. I don't want to talk about what's going on with him. It's kind of his story to tell, but he and I and a number of these people who are some of whom are in the space of who are not. We've had these like, weirdly fortuitous, and weirdly like terrible things happen to us. And it's a very interesting question of like, where does it why? And I think it has to do a lot with like, how the world really works, not how we want it to work anyway. I think the other big issue too is that the confidential informant system is deeply corrupt and deeply fucked up. And I know [X User] 'tundra' could speak to that, and I certainly could speak to that, because I've had things entered into the files that I sent that were the opposite of what I put in the fucking system, which makes me very upset, because it makes me look incompetent, and I hate looking incompetent, and so I ended up getting in all this trouble for, you know, basically putting things into the system that were wrong. And what ended up happening is I started writing the reports for Jonathan Buma and for others. And you know what I'm hopeful now is that a lot of the dirty FBI agents can be helpful, can really, like, clean themselves up, but really, at this stage, it's getting to a point that's like, really, really ridiculous. You know, like my dad used to say, I don't know a single poor DEA agent. And I certainly don't know a single poor DEA agent, homeland security

person. And I do think you know, there's a lot of civil asset forfeiture, but a lot of us who are, like, mistreated by the FBI or by the Department of Homeland Security or whatever, we should be recompensed in a serious way. I think I mean, like, years of my life were ruined because of the Mueller investigation. My wife had a nervous breakdown over a lot of the attacks on me. She couldn't handle it, which is why she's no longer my wife. So, like, there have been real costs to this sort of thing, and I think that there should be real accountability and a 'Truth and Reconciliation' thing I would be okay with. Like, I don't necessarily need people to I don't necessarily even need, like, a compensation, like, I, you know, I put it, put it for charity, or, like, whatever, dance around it, naked, lighting it on fire, like the choker. I don't really care. I just think there needs to be a kind of reckoning that takes place, and I think it needs to happen sooner rather than later.